# Dresser Flow Controls LAD071940233

Coun	nt	M	latrix	Penalty
		Harm	Deviation	1
I:	Storing hazardous waste without a permit - LQG storing > 90 days.	Minor	Minor	\$8,250
II:	Satellite Accumulation Point - Failing to label container - blasting sand	Minor	Minor	\$330
III:	Failing to make a hazardous waste determination	Minor	Moderate	\$1,100
IV:	Labeling used oil as "Waste Oil'	Minor	Minor	\$330
			Si .	\$10,010

Dresser Flow Controls is a manufacturer of relief valves and safety valves and is located in Alexandria, Louisiana. The processes involved in the manufacturing process include machining, welding, metal finishing, coating, assembly, testing and packaging. The facility was inspected on June 14, 2001.

COUNT: I

#### A. PENALTY COMPUTATION WORKSHEET

Company Name:

Dresser Flow Controls

Address:

Alexandria, Louisiana

Requirement Violated:

40 CFR §§ 270.1 and 270.10, and Section 3005(a) of RCRA, 42 U.S.C. § 6925(a): RCRA requires a permit for treatment, storage, and disposal of any hazardous waste. 40 CFR 262.34: a generator may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status provided that the waste is placed in containers or tanks and complies with Subpart I and J, the date up which each period of accumulation begins is clearly marked and visible for inspection on each container, each container and tank is labeled or marked with the words "hazardous waste", the generator complies with the requirements for owners or operators in Subparts C and D of 40 CFR Part 265, with 265.16 and with 40 CFR 268.7(a)(4) and the facility complies with the organic air emission standards of 40

CFR Subpart CC.

(72 days of noncompliance)

#### PENALTY AMOUNT FOR COMPLAINT

1.	Gravity based penalty from matrix	\$330
	(a) Potential for harm	Minor
	(b) Extent of deviation	Minor
2.	Select an amount from the appropriate multi-day matrix cell	\$110
3.	Multiply line 2 by number of days of violation minus 1 [or other number, as appropriate (provide narrative explanation)]	\$7,920
4.	Add line 1 and line 3	\$8,250
5.	Percent increase/decrease for good faith	0%
6.	Percent increase for willfulness/negligence	0%
7.	Percent increase for history of noncompliance	0%
8.*	Total lines 5 thru 7	0%
9.	Multiply line 4 by line 8	0%
10.	Calculate economic benefit	\$0
11.	Add lines 4, 9 and 10 for penalty amount to be inserted in the complaint	\$8,250

#### NARRATIVE EXPLANATION

#### COUNT I

### 1. Gravity Based Penalty

- (a) Potential for Harm: Minor The facility had 4 drums of D002 waste stored on site for 162 days at the time of the inspection. The drums were stored in a hazardous waste storage area, in good condition, and labeled. Based on these facts the potential for harm was deemed to be minor.
- (b) Extent of Deviation: Minor facility are exempt from the permitting requirements if all of the requirements under 262.34 are meet. All of the labeling and storage requirements were met, except for the time limit. Because this is the most important requirements for meeting the permit exemptions, the extent of deviation is moderate.
- (c) Multiple/Multi-day: The time frame for the multi day is 72 days. The waste was labeled with an accumulation date of January 2, 2001 and the inspection was on June 14, 2001. This is 163 days. The multiday is 163 days minus 90 for the time limit for a permit exemption minus 1 as provided in the RCRA penalty policy. A multiday penalty is assessed in this case because the facility is required to conduct weekly inspections of hazardous waste storage areas. Proper inspections should have prevented this violation from occurring.
- 2. Adjustment Factors (Good faith, willfulness/negligence, history of compliance, ability to pay, environmental credits and other unique factors must be justified, if applied.)
  - (a) Good Faith:
  - (b) Willfulness/Negligence:
  - (c) History of Compliance:
  - (d) Ability to Pay:
  - (e) Environmental Project:
  - (f) Other Unique Factors:
- **3. Economic Benefit:** The economic benefit is negligible. No significant cost is realized by delaying the disposal of the waste.
- 4. Recalculation of Penalty Based on New Information:

COUNT: II

#### A. PENALTY COMPUTATION WORKSHEET

Company Name:

**Dresser Flow Controls** 

Address:

Alexandria, Louisiana

Requirement Violated:

40 CFR 262.34(c)(1) - A generator may accumulate 55 gallons of hazardous waste in containers at or near any point of generation where wastes are initially generated provided they comply with 265.171 (storing waste in containers in good condition), 265.172

(compatibility of waste with containers), and 265.173

(management of containers). The containers must also be marked

with the words "Hazardous Waste" or with other words that

identify its contents.

#### PENALTY AMOUNT FOR COMPLAINT

1.	Gravity based penalty from matrix	\$330
	(a) Potential for harm	Minor
	(b) Extent of deviation	Minor
2.	Select an amount from the appropriate multi-day matrix cell	
3.	Multiply line 2 by number of days of violation minus 1 [or other number, as appropriate (provide narrative explanation)]	
4.	Add line 1 and line 3	\$330
5.	Percent increase/decrease for good faith	0%
6.	Percent increase for willfulness/negligence	0%
7.	Percent increase for history of noncompliance	0%
8.*	Total lines 5 thru 7	0%
9.	Multiply line 4 by line 8	\$0
10.	Calculate economic benefit	\$0
11.	Add lines 4, 9 and 10 for penalty amount to be inserted in the complaint	\$330

#### **NARRATIVE EXPLANATION**

#### COUNT II

- 1. Gravity Based Penalty
  - (a) Potential for Harm: Minor The waste accumulated in the satellite accumulation area was a sand blasting media in a small container that was only open to the inside of the sand blasting cabinet. The risk of exposure to humans or the environment was minimal.
  - (b) Extent of Deviation: Minor The only requirement not met by the satellite accumulation area was having the container labeled as hazardous waste or otherwise identifying the contents.
  - (c) Multiple/Multi-day: None
- 2. Adjustment Factors (Good faith, willfulness/negligence, history of compliance, ability to pay, environmental credits and other unique factors must be justified, if applied.)
  - (a) Good Faith:
  - (b) Willfulness/Negligence:
  - (c) History of Compliance:
  - (d) Ability to Pay:
  - (e) Environmental Project:
  - (f) Other Unique Factors:
- **3. Economic Benefit:** The economic benefit is negligible. Correcting the labeling violation would cost very little.
- 4. Recalculation of Penalty Based on New Information:

COUNT: III

#### A. PENALTY COMPUTATION WORKSHEET

**Company Name:** 

Dresser Flow Controls

Address:

Alexandria, Louisiana

Requirement Violated:

40 CFR 262.11(b) - A person who generates a solid waste must

determine if the waste is a listed hazardous waste under

Subpart D of 40 CFR 261

#### PENALTY AMOUNT FOR COMPLAINT

1.	Gravity based penalty from matrix	\$330
	(a) Potential for harm	Minor
	(b) Extent of deviation	Minor
2.	Select an amount from the appropriate multi-day matrix cell	
3.	Multiply line 2 by number of days of violation minus 1 [or other number, as appropriate (provide narrative explanation)]	
4.	Add line 1 and line 3	\$330
5.	Percent increase/decrease for good faith	
6.	Percent increase for willfulness/negligence	
7.	Percent increase for history of noncompliance	
8.*	Total lines 5 thru 7	
9.	Multiply line 4 by line 8	
10.	Calculate economic benefit	
11.	Add lines 4, 9 and 10 for penalty amount to be inserted in the complaint	\$330

## NARRATIVE EXPLANATION

#### **COUNT III**

- 1. Gravity Based Penalty
  - (a) Potential for Harm: Minor The facility used a lacquer thinner containing > 10% toluene as a cleaning agent, the resulting waste should carry a waste classification code of F005. The potential for harm in this case is deemed minor because the facility handled and disposed of the waste under waste code D001.
  - (b) Extent of Deviation: Moderate The facility identified one of the two waste codes associated with this waste. The extent of deviation is moderate because only half of the waste codes were identified.
  - (c) Multiple/Multi-day: None
- 2. Adjustment Factors (Good faith, willfulness/negligence, history of compliance, ability to pay, environmental credits and other unique factors must be justified, if applied.)
  - (a) Good Faith:
  - (b) Willfulness/Negligence:
  - (c) History of Compliance:
  - (d) Ability to Pay:
  - (e) Environmental Project:
  - (f) Other Unique Factors:
- 3. **Economic Benefit:** The violation is easily correctable at little or no cost to the facility. No economic benefit was calculated.
- 4. Recalculation of Penalty Based on New Information:

COUNT: IV

#### A. PENALTY COMPUTATION WORKSHEET

**Company Name:** 

**Dresser Flow Controls** 

Address:

Alexandria, Oklahoma

Requirement Violated:

40 CFR 279.22(c) Container and above ground storage tanks

used to store used oil at generator facilities must be labeled or

clearly marked with the words "Used Oil"

#### PENALTY AMOUNT FOR COMPLAINT

1.	Gravity based penalty from matrix	\$330
	(a) Potential for harm	Minor
	(b) Extent of deviation	Minor
2.	Select an amount from the appropriate multi-day matrix cell	
3.	Multiply line 2 by number of days of violation minus 1 [or other number, as appropriate (provide narrative explanation)]	
4.	Add line 1 and line 3	\$330
5.	Percent increase/decrease for good faith	0%
6.	Percent increase for willfulness/negligence	0%
7.	Percent increase for history of noncompliance	0%
8.*	Total lines 5 thru 7	0%
9.	Multiply line 4 by line 8	\$0
10.	Calculate economic benefit	\$0
11.	Add lines 4, 9 and 10 for penalty amount to be inserted in the complaint	\$330

#### **NARRATIVE EXPLANATION**

#### **COUNT IV**

- 1. Gravity Based Penalty
  - (a) Potential for Harm: Minor Used oil at this facility was stored 5 storage tanks each with a capacity of 2,800 gallons. The used oil tanks were in good shape with no leaks. The potential for harm is low.
  - (b) Extent of Deviation: Minor The used oil tank was labeled with the words "Waste Oil" instead of "Used Oil". All of the other storage requirements for used oil were complied with.
  - (c) Multiple/Multi-day: None
- 2. Adjustment Factors (Good faith, willfulness/negligence, history of compliance, ability to pay, environmental credits and other unique factors must be justified, if applied.)
  - (a) Good Faith:
  - (b) Willfulness/Negligence:
  - (c) History of Compliance:
  - (d) Ability to Pay:
  - (e) Environmental Project:
  - (f) Other Unique Factors:
- **3. Economic Benefit:** The economic benefit is negligible since the violation is easily correctable.
- 4. Recalculation of Penalty Based on New Information:



Friday, April 01, 2005

Craig Lutz, EPA
United States Environmental Protection Agency
Region 6
1445 Ross Avenue, Suite 1200
Dallas, TX. 75202-2733

Craig,

Attached is a rough draft of the final SEP Closure report. We are working on final engineering instructions; training and process start up.

Thanks for taking the time to review the rough draft to see if we have incorporated all the information needed to complete this closure report.

Terry A. Turner

Attached Rough Draft SEP Closure report:

Copy Ralph Foster:

## Rough Draft SEP Index

1	Sep Closure report	Page 1-3
2	SEP Graphic of expenditures	Page 4
3	Purchase order copies	Page 5-8
4	Invoices for project	Page 9-11
5	SEP Certification statement	Page 12

## Friday, March 11, 2005

Rough Draft of the SEP closure report for conversion to Black Oxide coating:

### Sep Closure Report shall address the following:

 a. A summary analysis in graphic and narrative form of all SEP monetary expenditures:

The narrative for the expenditures is broken down to three (3) phases of the project.

 The project(s) capital expenditure for the time and improvements to implement the conversion of the "zinc phosphating" process to "black oxide" process closed loop system.

#### Phase I

Feb. 2004 an engineering manager, a manufacturing manager, and myself went to review a company that was performing the black oxide process to review the process to see if it would be a good coating to change over to for our product line. We then also sent off some samples off our valve products to verify coating quality and suitability. We also then had to perform a salt spray test to validate the same consistency of the black oxide vs. a zinc phosphate coating. Both Engineering and manufacturing agreed this would be a satisfactory coating.

Approx. cost \$2,500.00 Expense:

#### Phase II

Feb 2004 a capital funding project was written for the equipment and installation for the change over from zinc phosphating to "black oxide".

The funding for this phase was \$40,000.00

Approval was received in March 2004:

Quotes and system needs were then drawn up and Birchwood Casey was awarded Purchase orders to proceed ahead on this project:

The installation funding for the project was awarded to AJC a local HVAC/Mechanical contractor.

Page 1 of 3

#### Phase III

Jan 2005 Approx. \$ 8,000.00 of new chemicals to convert to "black Oxide" coating was acquired:

 A summary analysis of the project with explanation of the respondent's adherence to the implementation plans approved by EPA.

Summary analysis of the project.

The completion of the CAFO set the wheels in motion to get this project going:

Quarter by Quarter review:

- First quarter was the investigation, the finalization, and implementation planning stages
  where the process "black oxide" was finalized as a direct replacement for our current
  "zinc phosphating" process and still retain product quality, and would not introduce a
  safety problem. There will still be a need to have well trained personnel that know how to
  handle chemicals (acids/caustics) safely.
- Second Quarter begin the layouts, and changes to tank configurations, and means to set up a "closed loop" system. Birchwood Casey recommended a general arrangement quote and the recirculation system was a custom made unit.
- Third Quarter all the purchase orders were issued to finalize the process to acquire the equipment.
- Fourth quarter finishing the engineering instrustions, opeatrional procedures and getting the process ready to be put in place.
- Fifth Quarter receiving the equipment, making platforms to get recirculation equipment off
  of the floor (steel spill protection pan) and piping to start up.
  This is the final phase and brings in the submission of the closure report, which is being
  done.
- c. A lesson's learned section describing what, if any adjustments to the approved implementation plan had to be made and the reason(s) why adjustments had to be made.

Lesson learned section, is the final review and set up the recirculation system pointed out that the need for more qualified and well-trained personnel would be beneficial from a safety point of view. The last six to eight months we had been using the shop machining personnel to run the old parkerize system, and it has ran over 4-6 times causing a chemical spill and cleanup that was completely contained, but still was a two day maintenance job that could have been avoided. This has cemented the need to set this up under trained maintenance personnel now, since the system will be closed loop and need even more operator attention to make this process work well.

Page 2 0 F 3

d. Certification of all funds spent implementing the SEP, documented by copies of purchase receipts, cancelled checks, etc.

Attached is a copy of the of all the Purchase orders, invoices, and cancelled checks to complete the implementation of this project. Also a certification document is signed and notarized to the validation of funds spent on this SEP. Non purchased items such as management hours spent and office time are only show, but affixed a dollar amount.

Page 3 0 = 3

	S)	SEP PRO	SEP PROJECT NO. CLOS	CLOSURE GRAPHIC EXPENDITURES	ITURES	Pa
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PURCHASE ORDERS EQUIPMENT BIRCHWOOD CASEY						Rever of Sin
PURCHASE ORDER INSTALL AND RECIRC						Standar &
PURCHASE ORDER MATEIRALS TO CHARGE LINE						8 J. 100
FINALIZE AND CLOSURE REPORT						0

Page 4



Vendor Information			BIRCHWOOD	Work Order	# Purchase Order #		ase Order#
	OOD CASEY LER ROAD			139	502	19	5005-6
EDEN PF		MN 55	5244	Date Of Requis	sition	R	elease #
(952)937-		(952)937	S-880,500,000	07/27/04		CONF	
QTY	Part #			Description			Total Cost
1		Т	O COVER ALL LABOR A	ND MATERIALS TO I	FABRICAT	E THE	
		L	OOP "BLACK OXIDE" RI	NSE WATER PROCE	SSING SY	STEM ТО	
		А	CCOMMODATE THE BIF	RCHWOOD CASEY T	RU TEMP	190 BLACK	
		C	XIDE PROCESS PER TH	HE QUOTE ATTACHE	ED:		19280.00
		P	ARTIAL PAYMENTS ALL	OWED:			
BASED ON PO ISSUED BY 8/6/04					9/24/04		
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T. TURNER					0143		
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			40001				

Page 5



Vendor Information			019569	Work Order	r# Purchase Order#		ase Order#	
	OOD CASEY			141500 2		29	95458-6	
EDEN PF	LER ROAD	MN 5	5344	Date Of Requis	sition	R	elease #	
(952)937-		(952)937		01/18/05		SUB T	TAT	
QTY	Part #			Description			<b>Total Cost</b>	
165		(	GALLONS (3 - 55 GALLO	N DRUMS) OF TRU-T	EMP XL BL	ACK OXIDE		
		(	CONCENTRATE \$37.80	PER GALLON			6237.00	
165		(	GALLONS ( 3-55 GALLON	DRUMS) OF DRI-TO	TOUCH IF	RP1 RUST		
		F	PREVENTIVE COMPOUN	ID \$13.80/GALLON			2277.00	
		_						
						Total	8514.00	
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Vendor Information			019569	Work Order	# Purchase Order #		ase Order#
	OOD CASEY			140	502	29	5302-6
	LER ROAD			Date Of Requisition		R	elease#
EDEN PR (952)937-		MN 55 (952)937		_ 11/09/04		CONI	F 3-17
QTY	Part #			Description	-		Total Cost
110		G	SALLONS OF SAFE SCR	UB ST LIQUID ALKAL	INE CLEA	NER	2079.00
1600		L	BS OF OXYPRIMER PO	WDER \$2.90/LB			4640.00
		A	BOVE FOR INITIAL CHA	ARGE OF THE BLACK	OXIDE SY	(STEM TO	
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А	pproved By		Appro	ved By		Appro	ved By





Vendor Information		006660	Work Orde	r#	Purch	ase Order#	
ALLEN JENKINS CON	TRACTOR	RINC.	139	502	19	5004-6	
1509 MELROSE ST. PINEVILLE	LA 7	1260	Date Of Requi	e Of Requisition		elease#	
443-0164	443-040		07/27/04		AR		
QTY Part			Description			Total Cost	
1		TO COVER COST OF AL		RIALS TO F	ABRICATE		
		AND INSTALL TWO (2) E	XHAUST VENTILATION	ON SYSTE	MS FOR THE		
		"BLACK OXIDE" PROCES	SS TANK SYSTEMS (	\$5,120/EA)		10240.00	
2		TO FABRICATE AND INS	TALL TWO(2) PROC	ESS TANKS	S FOR THE		
		"BLACK OXIDE" PROCES	SSS TANKS SYSTEM	S (4,250/E	١)	8500.00	
	1	BASED ON PO ISSUED BY 8/6/04:  DRAWINGS FOR APPROVALS BY 8/23/04					
	(	COMPLETED AND INSTALL BY OCT 4,2004 WEEK					
	SEE ATTACHMENT FOR P						
					Total	18740.00	
Stock		CA#	Contractor Start Contrac		Contract	or Completion	
			11		1		
Vendor Ordered Date	Vend	or Delivery Date	Hot			ID#	
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D 130		14:53:1086:701:00		MX-60HB			
T. TURNER		0143					
Carrier		Way Bill #					
Approved By		Appro	Approved By		Appro	ved By	
<b>жириочей ву</b>		Аррго	veu by		Appro	vea By	



Birchwood Laboratories, Inc. 7900 Fuller Road Eden Prairie, Minnesota 55344-2195 FEIN 41-1351619

DRESSER INC
DATTN: A/P
T PO BOX 1430
ALEXANDRIA LA 71309

DRESSER INC
P HIGHWAY 167 N
T ALEXANDRIA LA 71301

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THE SALE IS GOVERNED BY, AND SUBJECT TO, THE TERMS AND CONDITIONS OF SALE SET FORTH ON THE REVERSE SIDE HEREOF.

# PLEASE RETURN THIS STUB WITH YOUR REMITTANCE

TO INSURE PROPER CREDIT TO YOUR ACCOUNT PLEASE MAKE CHECK PAYABLE TO AND REMIT TO:

BIRCHWOOD LABORATORIES, INC. 7900 FULLER ROAD EDEN PRAIRIE, MN 55344-2195 CUSTOMER NAME DRESSER INC
ACCOUNT NO (COITS
INVOICE NO. 79/42
INVOICE DATE 9/14/04
INVOICE AMOUNT \$ 9,640.00

CASH DISC. DATE

NUMBER

AMOUNT)

FROM : Allen Jenkins Contractor, Inc. FAX NO. :443-0407

Apr. 01 2005 02:56PM

## ALLEN JENKINS CONTRACTOR, INC.

INVOICE

DATE

INVOICE #

11/29/2004

112904AJC2

1509 MELROSE STREET PINEVILLE, LA 71360 FAX: 318-443-0407 PHONE: 318-443-0164

DRESSER FLOW CONTROL

P. O. BOX 1430

ALEXANDRIA, LA. 71309-1430

ATTN: MR. TERRY TURNER

JOB LOCATION

JOB# DRE-PL **D-188 PARKERIZER LINE** 

**NEW TANKS** 

P.O. #	Project / AJC Job #	Scope of Work	
195004-6	DRE-PL New Tanks		
	DESCRIPTION		AMOUNT
THISTI MALORIAIS AND IADOR	to fabricate three steel tanks. This is a part of the	71. J	4,759.13

Thank you for your business.

Total

\$4,759.13 age 10

Apr. 01 2005 02:57PM P3

Alk copy

## ALLEN JENKINS CONTRACTOR, INC.

1509 MELROSE STREET PINEVILLE, LA 71360 FAX: 318-443-0407 PHONE: 318-443-0164

DRESSER FLOW CONTROL

ALEXANDRIA, LA. 71309-1430

ATTN: MR. TERRY TURNER

P. O. BOX 1430

INVOICE

DATE

INVOICE #

12/9/2004

120904AJC3

JOB LOCATION

JOB# DRE-PL D-188 PARKERIZER LINE Black Oxide Project

P.O. #	Project / AJC Job #	Scope of Work
195004-6	DRE-PL	Black Oxide Installation
	DESCRIPTION	AMOUNT
1		

£021108

Thank you for your business.

Total

\$13,980.87

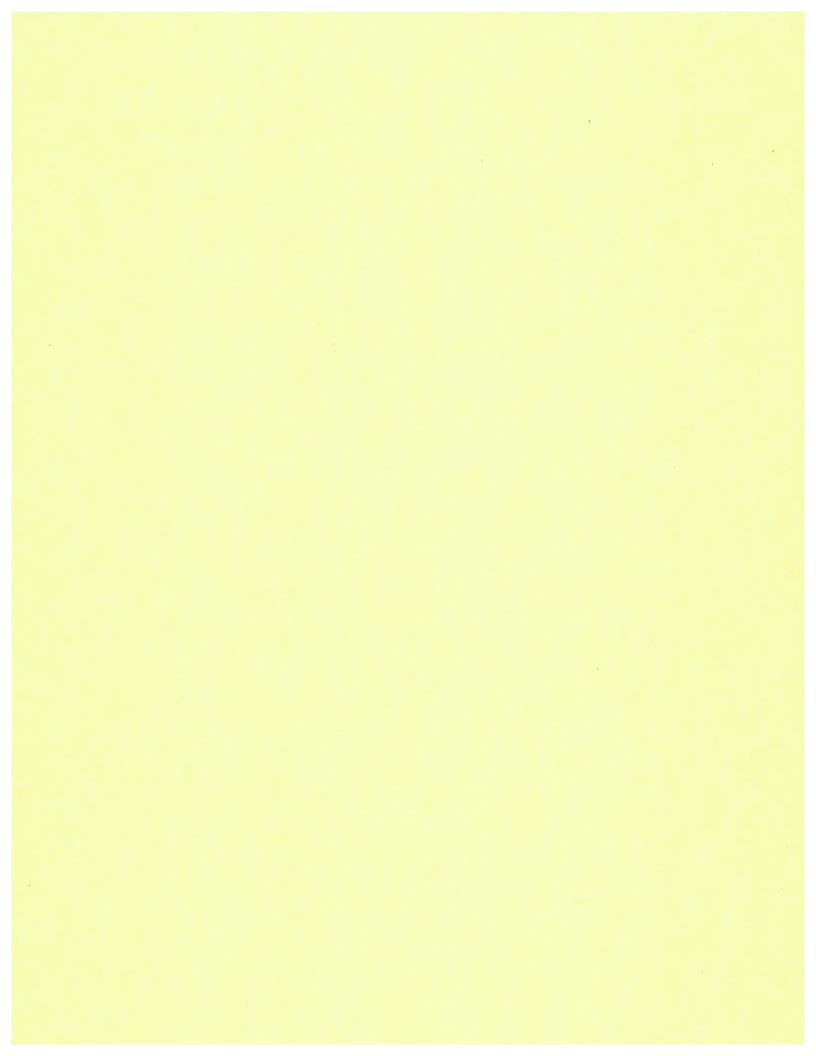
Page 11

# SEP CERTIFICATION SUBMITTED BY RESPONDENT/DEFENDANT WITH SEP PROPOSAL:

I certify to be true and accurate that Dresser, Inc. had not previously decided to implement the proposed Supplemental Environmental Project (SEP) prior to EPA's identification of the environmental violations and further certify that Dresser, Inc. did not commit funds necessary to implement the SEP prior to EPA's identification of the environmental violations.

Representative of Dresser, Inc.	Date	
ii.		
Title		a a

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# UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 6

DALLAS, TEXAS

REGIONAL HEARING CLERK EPA REGION VI

DITTIE MATTER OF	
IN THE MATTER OF:	§
DRESSER, INC., DRESSER MEASUREMENT DIVISION ALEXANDRIA, LOUISIANA	\$ DOCKET NO. RCRA-06-2003-0903 \$ \$
EPA I.D. NO. LAD071940233  RESPONDENT	\$ CONSENT AGREEMENT \$ AND FINAL ORDER
	§

I.

### PRELIMINARY STATEMENT

- 1. This proceeding for the assessment of civil penalties and compliance order was instituted by EPA pursuant to Section 3008 of the Resource Conservation and Recovery Act ("RCRA"), 42 U.S.C. § 6928, on June 18, 2003 by the filing of a Complaint, Compliance Order, and Notice of Opportunity for Hearing ("Complaint"). The Complaint charged the Respondent, Dresser, Inc., with violating RCRA and the regulations promulgated pursuant to RCRA.
- 2. The Respondent admits the jurisdictional allegations of the Complaint; however, the Respondent neither admits nor denies the specific factual allegations and conclusions of law contained in the Complaint or the Findings of Fact and Conclusions of Law contained in this Consent Agreement and Final Order ("CAFO"). The Complaint states a claim upon which relief may be granted.
- 3. The Respondent explicitly waives any right to contest the allegations and its right to appeal the proposed final order contained in this CAFO, and waives all defenses which have

been raised or could have been raised to the claims set forth in the Complaint.

- 4. This CAFO resolves those violations which were alleged in the Complaint.
- 5. The Respondent consents to the issuance of the CAFO hereinafter recited and consents to the assessment and payment of the stated civil penalty in the amount and by the method set out in this CAFO.

II.

#### FINDINGS OF FACT AND CONCLUSIONS OF LAW

- 6. Dresser, Inc. ("Respondent") is a corporation incorporated under the laws of the State of Delaware and qualified to conduct business in the State of Louisiana.
  - 7. Respondent began doing business in the State of Louisiana in 1979.
- 8. Respondent is a corporation, and therefore is a "person" as that term is defined in Louisiana Administrative Code ("LAC") 33:V.109, Section 1004(15) of RCRA, 42 U.S.C. § 6903(15), and 40 Code of Federal Regulations ("C.F.R.") § 260.10.
- Respondent's Registered Agent for service is Corporation Service Company, 320
   Somerulos Street, Baton Rouge, Louisiana 70802-6129.
- 10. Respondent owns and operates a business that manufactures relief valves and safety valves, involving processes which include machining, welding, metal finishing, coating, assembly, and packaging. The business is located at the intersection of U.S. Highway 167 North and State Highway 3220 in Alexandria, Louisiana ("Facility").
- 11. Pursuant to Section 3010(a) of RCRA, 42 U.S.C. § 6930(a), on or about August 8, 1980, Respondent filed a Notification of Registration ("NOR") with the Louisiana Department of Environmental Quality ("LDEQ") as a Large Quantity Generator of Hazardous Waste. The

Respondent's Facility was assigned the EPA Identification Number LAD071940233.

- 12. For purposes of this CAFO, the term "Hazardous Waste" shall mean "Hazardous Waste" as defined at LAC 33:V.109 [40 C.F.R. § 261.3].
- 13. The Respondent's Facility is a "facility" as that term is defined at LAC 33:V.109 [40 C.F.R. § 260.10].
- 14. The Respondent is a "generator" of hazardous waste as that term is defined at LAC 33:V.109 [40 C.F.R. § 260.10].
- 15. Pursuant to Section 3007(a) of RCRA, 42 U.S.C. § 6927(a), EPA representatives conducted a Compliance Evaluation Inspection ("Inspection") at Respondent's Facility on June 14, 2001.

#### RCRA VIOLATIONS ALLEGED

COUNT I - HAZARDOUS WASTE STORAGE AREA:

OPERATING A HAZARDOUS WASTE STORAGE FACILITY WITHOUT INTERIM
STATUS OR PERMIT IN VIOLATION OF 40 C.F.R. §§ 270.1 AND 270.10, AND RCRA
SECTION 3005(a), BY FAILING TO MEET THE EXEMPTION REQUIREMENTS OF LAC
33:V Subpart 1 [40 C.F.R. § 262.34]

- 16. Pursuant to LAC 33:V Subpart 1 [40 CFR §§ 270.1 and 270.10] and RCRA Section 3005, the storage of hazardous waste is prohibited without a permit or interim status.
- 17. During the Inspection, EPA representatives observed, documented, and photographed four (4) drums of material situated in the Facility's designated hazardous waste storage area with accumulation start-dates marked as January 2, 2001. These drums had remained on-site in excess of the allowed ninety (90) day storage period.
  - 18. Pursuant to LAC:V.1109.E.2 [40 C.F.R. § 262.34(a)] generators of hazardous waste

are allowed to store waste on-site for ninety days without a permit or interim status, in accordance with LAC 33:V Subpart 1 [40 C.F.R. §§ 270.1 and 270.10]. A generator who accumulates hazardous waste on-site for more than ninety (90) days is considered an operator of a hazardous waste storage facility and is subject to the requirements of 40 C.F.R. parts 264 and 265 and the permit requirements of 40 C.F.R. part 270, unless the generator has been granted an extension to the 90-day period.

- 19. Therefore, based on the above, Respondent violated LAC 33:V Subpart 1 [40 C.F.R. §§ 270.1 and 270.10] and RCRA Section 3005 by storing hazardous waste for longer than ninety (90) days without a permit or interim status.
- COUNT II SATELLITE ACCUMULATION CONTAINER:

  OPERATING A HAZARDOUS WASTE STORAGE FACILITY WITHOUT INTERIM
  STATUS OR PERMIT IN VIOLATION OF 40 C.F.R. §§ 270.1 AND 270.10, AND RCRA
  SECTION 3005(a), BY FAILING TO MEET THE EXEMPTION REQUIREMENTS OF LAC
  33:V Subpart 1 [40 C.F.R. § 262.34]
- 20. During the Inspection, EPA representatives observed, documented, and photographed a satellite container accumulating used sandblasting materials. Facility personnel stated to the EPA representatives at the time of the inspection that the Facility classified said sandblasting waste as a D008 hazardous waste which exhibits the characteristic of toxicity for lead, as defined at LAC:V.4903.E.2 [40 C.F.R. § 261.24]. Respondent failed to properly label and identify the contents of said container.
- 21. Pursuant to LAC:V.1109.E.4 [40 C.F.R. § 262.34(c)] a generator is allowed to accumulate as much as fifty-five (55) gallons of hazardous waste in containers at or near the point of generation without a permit or interim status, provided that the generator clearly marks the containers with the words "Hazardous Waste" or other words that identify the contents of the

container. Respondent does not have a RCRA permit, nor is the Facility operating under interim status.

22. Therefore, based on the above, Respondent violated LAC:V.1109.E.4 [40 C.F.R. § 262.34(c)] by failing to mark the container accumulating used sandblasting material with the words "Hazardous Waste" or other words that identify the contents. Thus, Respondent failed to meet the exemption requirements of 40 C.F.R. § 262.34, and stored hazardous waste without a permit or interim status in violation of 40 C.F.R. §§ 270.1 and 270.10, RCRA Section 3005(a), and LAC 33:V Subpart 1.

# COUNT III - FAILURE TO MAKE A HAZARDOUS WASTE DETERMINATION AS REQUIRED BY LAC 33:V.1103 [40 C.F.R. § 262.11]

- 23. During the Inspection, representatives of the Facility stated that a lacquer thinner (Sherwin-Williams Sol-Lac RK120) was used as a solvent for cleaning paint guns at the Facility. Facility personnel stated to EPA representatives that the Facility classified the waste generated by the paint gun cleaning process as a D001 hazardous waste which exhibits the characteristic of ignitability, as regulated by LAC:V.4903.B [40 C.F.R. § 261.21]. A review of the Material Safety Data Sheet (MSDS) shows that said lacquer thinner contains thirteen percent (13%) toluene by weight which is twelve percent (12%) toluene by volume.
- 24. Pursuant to LAC:V.4901.B.1 [40 C.F.R. § 261.31] spent toluene, a non-halogenated solvent, contains ten percent (10%) or more toluene by volume (before use) and is thereby listed as a hazardous waste with the EPA (Hazardous Waste No. F005).
- 25. Pursuant to LAC:V.1103.B [40 C.F.R. § 262.11(b)] a person who generates a solid waste must first determine if that waste is a listed hazardous waste, in accordance with LAC:V

Chapter 49 [40 C.F.R. § 261, Subpart D].

26. Therefore, based on the above, Respondent violated LAC:V.1103 [40 C.F.R. § 262.11] by failing to first determine that the solid waste was a listed hazardous waste generated from the paint gun cleaning process, as set forth under LAC:V Chapter 49 [40 C.F.R. § 261, Subpart D].

COUNT IV - FAILURE TO COMPLY WITH USED OIL STORAGE REQUIREMENTS BY ACCUMULATING USED OIL IN VIOLATION OF LAC: V.4301 [40 C.F.R. § 279.22]

- 27. Pursuant to 40 CFR § 279.22, which is adopted by reference in LAC:V.4301, "containers and above ground tanks used to store used oil at generator facilities must be in good condition (no severe rusting, apparent structural defects or deterioration); not leaking (no visible leaks); and must be labeled or clearly marked with the words "Used Oil."
- 28. During the Inspection, EPA representatives observed, documented, and photographed five (5) tanks labeled as "Waste Oil". Facility personnel stated that the material stored in the tanks was wastewater containing an alkaline based cleaner and a paraffinic machine cutting oil. The Respondent further stated that the material was collected and sent to a fuel-blending facility.
- 29. The material stored in the tanks labeled "Waste Oil" is a used oil, as defined by LAC:V.4001 [40 C.F.R. § 279.1]. Used oil is any oil which has been refined from crude oil and subsequently used. As a result of such use, used oil is contaminated by physical or chemical impurities.
- 30. Respondent stored machine cutting oil and cleaner with wastewater in said tanks.

  The combined mixture of these constituents constitutes a material which meets the definition of used oil.

- 31. Generators are a required by LAC:V.4301.C.1 [40 C.F.R. § 279.22(c)] to label containers and tanks containing used oil with the words "Used Oil".
- 32. Respondent violated LAC:V.4301.C.1 [40 C.F.R. § 279.22(c)] by failing to label the tanks containing used oil with the words "Used Oil".
- 33. Therefore, based on the above, Respondent violated LAC:V.4301 [40 C.F.R. § 279.22], by failing to comply with used oil storage requirements.

#### III.

### RCRA COMPLIANCE ORDER

- 34. Pursuant to Section 3008(a) of RCRA, 42 U.S.C. § 6928(a), the Respondent is hereby **ORDERED** to take the following actions and provide evidence of compliance within the time period specified below:
- A. Respondent shall immediately cease unauthorized storage of hazardous waste and transport off-site any hazardous waste stored on-site in excess of ninety (90) days. Respondent shall provide documentation to EPA and LDEQ demonstrating that all hazardous waste accumulated on-site without a permit or without having interim status remains on-site for no more than ninety (90) days, pursuant to LAC:V.1109.E.2 [40 C.F.R. § 262.34(a)], and 40 C.F.R. parts 264, 265, and 270.
- B. Respondent shall immediately label or mark each container accumulating hazardous waste at or near the point of generation with the words "Hazardous Waste" or other words to identify the contents, pursuant to LAC:V.1109.E.4 [40 C.F.R. § 262.34(c)].
- C. Respondent shall immediately label and clearly mark each container and/or tank used for the storage of used oil with the words "Used Oil", pursuant to LAC:V.4301.C.1 [40]

C.F.R. § 279.22(c)].

- D. If Respondent fails to comply with the actions ordered in paragraphs A through C (above) upon receipt of this CAFO, then Respondent shall immediately cease storage of all hazardous waste at the Facility until a hazardous waste storage permit has been applied for, approved, and obtained by Respondent.
- E. No later than thirty (30) days after the effective date of this Compliance Order, Respondent shall submit to EPA a written certification that the actions ordered in paragraphs A through C (above) have been completely satisfied.
- F. No later than sixty (60) days after the effective date of this Compliance Order, Respondent shall provide to EPA an itemized expense sheet listing costs incurred by Respondent in association with compliance of the requirements set forth in paragraphs A through C (above), including quantity and disposal costs for removal of the waste located in the Facility's hazardous waste storage areas.
- G. In all instances in which this CAFO requires written submissions to EPA, each submission must be accompanied by the following certification signed by a "responsible official":

I certify that the information contained in or accompanying this submission is true, accurate and complete. As to those identified portions of this submission for which I cannot personally verify the truth and accuracy, I certify as the company official having supervisory responsibility for the person(s) who, acting upon my direct instructions, made the verification, that this information is true, accurate, and complete.

For the purpose of this certification, a "responsible official" of a Respondent means a person with the authority to bind the Respondent as to the truth, accuracy, and completeness of

all certified information.

H. All documents required under this CAFO shall be sent to the following persons:

Carol Peters-Wagnon, Chief RCRA Enforcement Branch ALONM Section (6EN-HS) U.S. EPA - Region 6 1445 Ross Avenue Dallas, TX 75202-2733

Scott McDonald (6RC-EW) Office of Regional Counsel U.S. EPA - Region 6 1445 Ross Avenue Dallas, TX 75202-2733

Peggy Hatch, Administrator Enforcement Division Louisiana Department of Environmental Quality Office of Environmental Compliance P.O. Box 82215 Baton Rouge, LA 70884-2215

IV.

### SUPPLEMENTAL ENVIRONMENTAL PROJECT

35. Respondent agrees to undertake a supplemental environmental project ("SEP"), which the parties agree is intended to secure significant environmental or public health protection and improvement. The SEP shall replace the current zinc phosphating line process with a new "black oxide" process involving a closed loop system at Respondent's Facility located at the intersection of U.S. Highway 167 North and State Highway 3220 in Alexandria, Louisiana. This SEP is designed to reduce waste and elimate hazardous waste stream D002 (corrosive acid and alkaline wastewater solutions) generated on-site by Respondent's zinc phosphating process.

Thus, the SEP falls within the category of 'waste reduction', as set forth in EPA's SEP Policy.

The SEP satisfies the required 'nexus' to the violations alleged in the Complaint because the implementation of the SEP will address hazardous waste management and storage procedures at the Facility:

- A. Respondent's total expenditures for the SEP shall not be less than THIRTY-FIVE
   THOUSAND DOLLARS (\$35,000).
- B. Respondent shall undertake and complete SEP activities to the satisfaction of EPA pursuant to the terms and conditions set forth in this CAFO and the SEP Scope of Work ("SEPSOW"). The SEPSOW is attached to this CAFO as Appendix A and incorporated by reference. Respondent shall take the following actions:
  - i. Within forty-five (45) days after receipt of the filed CAFO, Respondent shall submit a sufficient Implementation Plan to EPA for review and comment. The Implementation Plan is subject to EPA approval in accordance with the terms of the CAFO and shall be prepared in accordance with the SEPSOW.
  - ii. Within sixty (60) days after receipt of EPA's 'notification of approval' of the Implementation Plan, Respondent will undertake said activities pursuant to the Implementation Plan.

## IMPLEMENTATION PLAN

- 36. Respondent shall undertake and complete the SEP in accordance with the terms of the CAFO and SEPSOW.
- 37. Respondent shall submit quarterly progress reports to EPA in accordance with the SEPSOW. The quarterly progress reports are due on the tenth (10) day of every third month

after the effective date of this CAFO.

- 38. Respondent shall complete the SEP project within eighteen (18) months of the effective date of this CAFO.
- 39. No later than sixty (60) days after Respondent has completed the SEP, Respondent shall submit a SEP Closure Report.
- 40. EPA will review the Implementation Plan, and if applicable, the Closure Report, included in Appendix A, submitted by Respondent pursuant to the CAFO and SEPSOW. EPA will provide written approval or disapproval with comments regarding the Implementation Plan and Closure Report (hereinafter referred to as "SEPSOW Plan") submitted by Respondent.
- 41. Within thirty (30) days of receipt of EPA's disapproval of a SEPSOW Plan,
  Respondent shall revise the SEPSOW Plan in accordance with EPA's comments and shall submit
  a revised SEPSOW Plan to EPA. EPA will respond in writing by approving or disapproving the
  plan with comments. If the revised SEPSOW Plan is again disapproved by EPA, the Respondent
  shall present another revised SEPSOW Plan withing twenty (20) days of EPA's second
  disapproval. EPA will approve or disapprove in writing the second revised submittal.
- 42. Any SEPSOW Plan, approved in writing by EPA, shall be deemed incorporated into this CAFO. Within thirty (30) days of approval of the specific SEPSOW Plan, Respondent shall commence work by implementing the tasks set forth in the approved SEPSOW Plan, pursuant to the Scope of Work Section contained in the SEPSOW. All work shall be conducted in accordance with the standards, specifications, and schedules set forth in the approved SEPSOW Plan. Any non-compliant activities shall be considered a violation of the terms of this CAFO and subject to the stipulated penalties outlined in Section VII of this CAFO.

- 43. Oral advice or approval given by EPA representatives will not constitute official approval, nor shall any oral assurance.
- 44. Respondent hereby agrees not to claim funds expended in the performance of the SEP as a deductible business expense for purposes of federal taxes. In addition, Respondent hereby agrees that, within thirty (30) days of the date it submits its federal tax reports for the calender year in which the above-identified SEP is completed, it will submit to EPA certification that any funds expended in the performance of this SEP have not been deducted from federal taxes.
- 45. Nothing herein shall obligate Respondent to publicize its involvement in the SEP; however, any public statement, oral or written, made by Respondent to publicize its participation in SEP activities shall include the following language: "This project was undertaken in connection with the settlement of an enforcement action taken by the U.S. Environmental Protection Agency for violations of RCRA provisions."

V.

#### PENALTY ORDER

46. Pursuant to the authority granted in Section 3008 of RCRA, 42 U.S.C. § 6928, and upon consideration of the entire record herein, including the above referenced Findings of Fact and Conclusions of Law, which are hereby adopted and made a part hereof, and upon consideration of the seriousness of the alleged violations, good faith efforts to comply with the applicable regulations, and the October 1990 RCRA Civil Penalty Policy, Respondent agrees to pay a civil penalty in the amount of TWO THOUSAND FIVE HUNDRED AND THREE DOLLARS (\$2,503.00).

- 47. In the event that Respondent pays the agreed civil penalty stated above (\$2,503.00), but fails to perform the SEP described herein, then Respondent shall pay an additional civil penalty in the amount of SEVEN THOUSAND FIVE HUNDRED AND SEVEN DOLLARS (\$7507.00).
- 48. The agreed civil penalty shall be paid by mailing a cashier's check or certified check payable to the Treasurer of the United States of America, within thirty (30) days of the effective date of this CAFO, to the following address:

Regional Hearing Clerk (6C) U.S. EPA, Region 6 P.O. Box 360582M Pittsburgh, Pennsylvania 15251

The case name and docket number (In the Matter of Dresser, Inc., Docket No. RCRA-06-2003-0903) shall be clearly typed on the check to ensure proper credit.

49. Respondent shall send a simultaneous notice of such payment, including a copy of the cashier's check or certified check to the following:

Lorena Vaughn Regional Hearing Clerk (6RC) U.S. EPA - Region 6 1445 Ross Avenue Dallas, TX 75202-2733

Carol Peters-Wagnon, Chief RCRA Enforcement Branch ALONM Section (6EN-HS) Compliance Assurance and Enforcement Division U.S. EPA - Region 6 1445 Ross Avenue Dallas, TX 75202-2733 Scott McDonald (6RC-EW) Office of Regional Counsel U.S. EPA - Region 6 1445 Ross Avenue Dallas, TX 75202-2733

Your adherence to this request will ensure proper credit is given when penalties are received in the EPA Regional Office.

50. Pursuant to 31 U.S.C. § 3717 and 40 C.F.R. § 13.11, unless otherwise prohibited by law, EPA will assess interest and late payment penalties on outstanding debts owed to the United States and a charge to cover the costs of processing and handling a delinquent claim. If payment is not timely made, interest shall accrue from the date payment is due and until the payment is made. Interest will be assessed at the rate of the United States Treasury tax and loan rate in accordance with 40 C.F.R. § 13.11(a). Moreover, the costs of the Agency's administrative handling of overdue debts will be charged and assessed monthly throughout the period the debt is overdue. 40 C.F.R. § 13.11(b). EPA will also assess a \$15.00 administrative handling charge for administrative costs on unpaid penalties for the first thirty (30) day period after the payment is due and an additional \$15.00 for each subsequent thirty (30) days the penalty remains unpaid. In addition, a penalty charge of up to six percent per year will be assessed monthly on any portion of the debt which remains delinquent more than ninety (90) days. 40 C.F.R. § 13.11(c). Should assessment of the penalty charge on the debt be required, it shall accrue from the first day payment is delinquent. 31 C.F.R. § 901.9(d). Other penalties for failure to make a payment may also apply.

### PARTIES BOUND

51. The provisions of this CAFO shall apply to and be binding upon the parties to this action, their officers, directors, agents, employees, successors, and assigns. The undersigned representative of each party to this CAFO certifies that he or she is fully authorized by the party whom he or she represents to enter into the terms and conditions of this CAFO and to execute and to legally bind that party to it.

### VII.

### STIPULATED PENALTIES

52. In addition to any other remedies or sanctions available to EPA, if the Respondent fails or refuses to comply with any provision of this CAFO, the Respondent shall pay stipulated penalties in the following amounts for each day during which each failure or refusal to comply continues:

Period of	Penalty Per
Failure to Comply	Violation Per Day
1st through 15th day	\$1,000.00
16th through 30th day	\$5,000.00
31st day and beyond	\$10,000.00

Penalties shall accrue from the date of the noncompliance until the date the violation is corrected, as determined by EPA.

53. The payment of stipulated penalties shall be made by mailing a cashier's check or certified check payable to the Treasurer of the United States, within thirty (30) days of receipt of a demand letter for payment to the following address:

Regional Hearing Clerk (6C) U.S. EPA, Region 6 P.O. Box 360582M Pittsburgh, PA. 15251

The case name and docket number (In the Matter of Dresser, Inc., Docket No. RCRA 06-2003-0903 shall be clearly typed on the check to ensure proper credit. The Respondent shall send simultaneous notices of such payments, including copies of the cashier's check or certified check to the following:

Lorena Vaughn Regional Hearing Clerk (6RC) U.S. EPA - Region 6 1445 Ross Avenue Dallas, TX 75202-2733

Carol Peters-Wagnon, Chief RCRA Enforcement Branch ALONM Section (6EN-HS) Compliance Assurance and Enforcement Division U.S. EPA - Region 6 1445 Ross Avenue Dallas, TX 75202-2733

Scott McDonald (6RC-EW) Office of Regional Counsel U.S. EPA - Region 6 1445 Ross Avenue Dallas, TX 75202-2733

Adherence to these procedures will ensure proper credit when payments are received. Interest on stipulated penalties shall begin to accrue upon receipt of the demand letter, and will be recovered by EPA on any amount of the stipulated penalty not paid within thirty (30) days of receipt of the demand letter. In addition, the provisions of Section V concerning interest, penalties, and administrative costs also apply.

- 54. In addition to the stipulated penalties set forth above, EPA specifically reserves the right to seek other remedies or sanctions available to the EPA by reason of the Respondent's failure to comply with the requirements of this CAFO, including sanctions that EPA may seek under Section 3008 of RCRA, 42 U.S.C. § 6928.
- 55. If the Respondent disputes the basis for imposition of stipulated penalties, the issue shall be resolved under the Dispute Resolution procedures of this CAFO. All stipulated penalties shall continue to accrue through the period that dispute resolution is ongoing. Invoking dispute resolution shall not stay the accrual of stipulated penalties; however, the obligation to pay shall be stayed pending resolution of the dispute.

### VIII.

### **DISPUTE RESOLUTION**

56. If the Respondent objects to any decision or directive of EPA in regard to Sections II, III, IV, or V, the Respondent shall notify the following persons in writing of its objections, including the basis for those objections, within fifteen (15) calendar days of receipt of EPA's decision or directive:

Carol Peters-Wagnon, Chief RCRA Enforcement Branch ALONM Section (6EN-HS) Compliance Assurance and Enforcement Division U.S. EPA - Region 6 1445 Ross Avenue Dallas, TX 75202-2733

Scott McDonald (6RC-EW) Office of Regional Counsel U.S. EPA - Region 6 1445 Ross Avenue Dallas, TX 75202-2733

- 57. The RCRA Enforcement Branch Chief or his designee (Branch Chief), and the Respondent shall then have an additional fifteen (15) calendar days from EPA's receipt of the Respondent's written objections to attempt to resolve the dispute. If an agreement is reached between the Branch Chief and the Respondent, the agreement shall be reduced to writing and signed by the Branch Chief and the Respondent and incorporated by reference into this CAFO.
- 58. If no agreement is reached between the Branch Chief and the Respondent within that time period, the dispute shall be submitted to the Director of the Compliance Assurance and Enforcement Division or his designee (Division Director). The Division Director and the Respondent shall then have a second 15-day period to resolve the dispute. If an agreement is reached between the Division Director and the Respondent, the resolution shall be reduced to writing and signed by the Division Director and Respondent and incorporated by reference into this CAFO. If the Division Director and the Respondent are unable to reach agreement within this second 15-day period, the Division Director shall provide a written statement of EPA's decision to the Respondent, which shall be binding upon the Respondent and incorporated by reference into the CAFO.
- 59. If the Dispute Resolution process results in a modification of this CAFO, the modified CAFO must be approved by the Regional Judicial Officer and filed pursuant to Section X (Modifications).

### IX.

### NOTIFICATION

60. Unless otherwise specified elsewhere in this CAFO, whenever notice is required to be given, whenever a report or other document is required to be forwarded by one party to

another, or whenever a submission or demonstration is required to be made, it shall be directed to the individuals specified below at the addresses given (in addition to any action specified by law or regulation), unless these individuals or their successors give notice in writing to the other parties that another individual has been designated to receive the communication:

EPA:

Carol Peters-Wagnon, Chief RCRA Enforcement Branch ALONM Section (6EN-HS)

Compliance Assurance and Enforcement Division

U.S. EPA - Region 6 1445 Ross Avenue Dallas, TX 75202-2733

Respondent:

Peter M. Reynolds

Assistant General Counsel

Dresser, Inc.

15455 Dallas Parkway Addison, TX 75001

X.

### MODIFICATION

61. The terms, conditions, and compliance requirements of this CAFO may not be modified or amended except upon the written agreement of both parties, and approved by a Regional Judicial Officer, and such modification or amendment being filed with the Regional Hearing Clerk.

XI.

# RETENTION OF ENFORCEMENT RIGHTS

- 62. EPA does not waive any rights or remedies available to EPA for any other violations by the Respondent of Federal or State laws, regulations, or permitting conditions.
  - 63. Except as specifically provided in this CAFO, nothing herein shall limit the power

and authority of EPA or the United States to take, direct, or order all actions to protect public health, welfare, or the environment, or prevent, abate, or minimize an actual or threatened release of hazardous substances, pollutants, contaminants, hazardous substances on, at or from Respondent's Facility. Furthermore, nothing in this CAFO shall be construed to prevent or limit EPA's civil and criminal authorities, or that of other Federal, State, or local agencies or departments to obtain penalties or injunctive relief under other Federal, State, or local laws or regulations.

### XII.

### **INDEMNIFICATION OF EPA**

64. Neither EPA nor the United States Government shall be liable for any injuries or damages to person or property resulting from the acts or omissions of the Respondent, their officers, directors, employees, agents, receivers, trustees, successors, assigns, or contractors in carrying out the activities required by this CAFO, nor shall EPA or the United States Government be held out as a party to any contract entered into by the Respondent in carrying out the activities required by this CAFO.

#### XIII.

### RECORD PRESERVATION

65. The Respondent shall preserve, during the pendency of this CAFO, all records and documents in its possession or in the possession of its divisions, employees, agents, contractors, or successors which in any way relate to this CAFO regardless of any document retention policy to the contrary.

### XIV.

### COSTS

66. Each party shall bear its own costs and attorney's fees. Furthermore, Respondent specifically waives its right to seek reimbursement of its costs and attorney's fees under the Equal Access to Justice Act (5 U.S.C. § 504), as amended by the Small Business Regulatory Enforcement Fairness Act (P.L. 104-121), and any regulations promulgated pursuant to those Acts.

### XV.

### **TERMINATION**

67. At such time as the Respondent believes that it has complied with all terms and conditions of this CAFO, it may request that EPA concur whether the requirements of this CAFO have been satisfied. Such request shall be in writing and shall provide the necessary documentation to establish whether there has been full compliance with the terms and conditions of this CAFO. EPA will respond to said request in writing within 90 days of receipt of the request. This CAFO shall terminate when all actions required to be taken by this CAFO have been completed, and the Respondent has been notified by the EPA in writing that this CAFO has been satisfied and terminated.

### XVI.

# EFFECTIVE DATE

This CAFO, and any subsequent modifications, become effective upon filing with the Regional Hearing Clerk.

THE UNDERSIGNED PARTIES CONSENT TO THE ENTRY OF THIS CONSENT AGREEMENT AND FINAL ORDER:

FOR THE RESPONDENT

Date: 11-11-03

Representative of Dresser, Inc.

John Richard Featen

N.P. + Gen. Mayr.

Pressure Relief Values.

FOR THE COMPLAINANT:

Date! 2 -4-2003

Samuel Coleman, P.E.

Director

Compliance Assurance and

**Enforcement Division** 

U.S. Environmental Protection Agency

Region 6

This Consent Agreement and Final Order is hereby adopted and issued pursuant to Section 3008 of RCRA, 42 U.S.C. § 6928, and the Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties, 40 C.F.R. Part 22.

It is so ORDERED. This Order shall become effective immediately upon filing with the Regional Hearing Clerk.

Date: 12 15 2003

Regional Judicial Officer

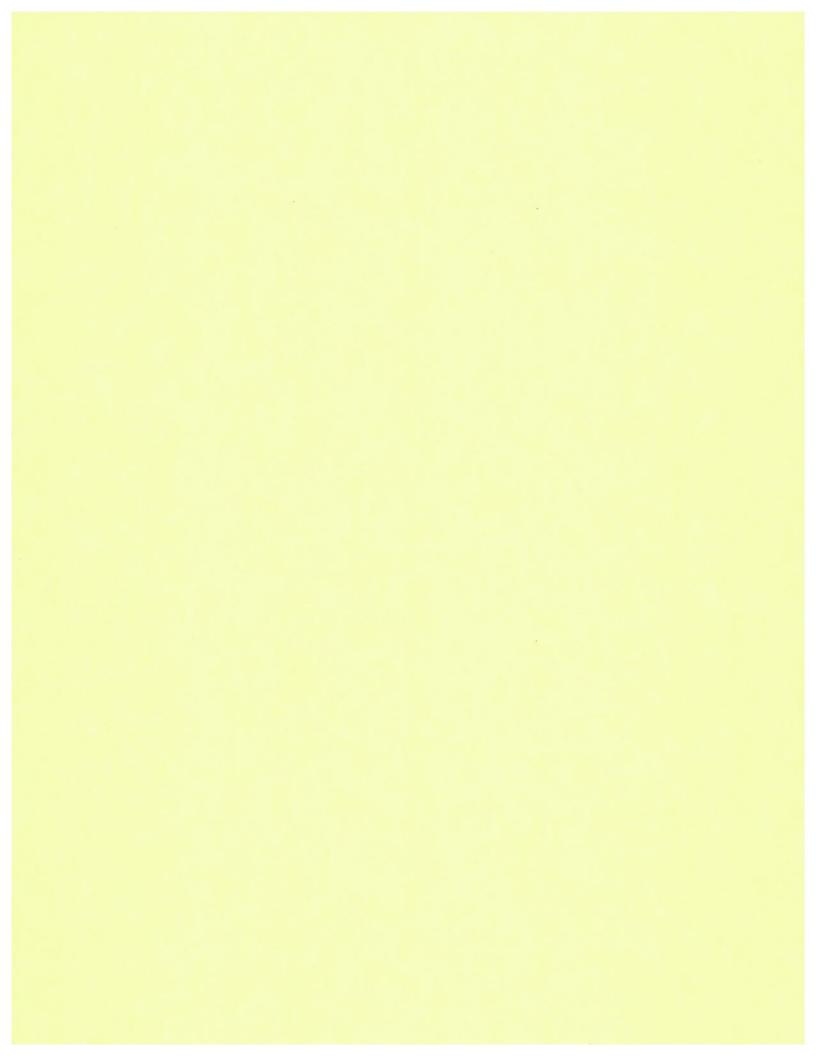
### CERTIFICATE OF SERVICE

I hereby certify that on the Agreement and Final Order (CAFO) concerning Dresser, Inc., Docket No. RCRA-06-2003-0903, was hand delivered to the Regional Hearing Clerk, U.S. EPA - Region 6, 1445 Ross Avenue, Dallas, Texas 75202-2733, and that a true and correct copy of the CAFO was sent to the following by the method identified below:

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Peter M. Reynolds Assistant General Counsel Dresser, Inc. 15455 Dallas Parkway Addison, TX 75001

Corporation Service Company Registered Agent 320 Somerulos Street Baton Rouge, Louisiana 70802-6129



# RCRA 3008(a) FINAL CAFO SIGNATURE ROUTING SLIP

FACILITY NAM	Æ;	Dresser Inc.					
ADDRESS:	To a constant of the constant	U.S. Highway 167 and State Highway 3220, Alexandria , Louisiana					na
EPA I.D. NO.:	¥ .	LAD071904233					
DOCKET NO.:	9	RCRA-6-2003-0903					
ENF. OFFICER:	70	Craig Lutz					
ATTORNEY:	9 1	Scott McDonald					
CHECKLIST:			YES	NO	AVA	ILABLE	N/A
1. 2. 3. 4. 5. 6. 7. 8. 9. 10. 11. 12. 13. 14. 15. 16.	ORIGINAL PENA PEER REVIEW DO SEP FACT SHEET SEP DOCUMENT CASE CONCLUST BEN/ABLE/PROJE RCRA INFO DAT	LETTER  OF SERVICE ATION  NT STRATEGY FLEMENT PENALTY ALTY COMPUTATION DOCUMENTATION T FATION SION DATA SHEET	[ ] [X] [ ] [X] [X] [X] [X] [X] [X] [X] [X] [X]	[ ] [X] [X] [ ] [ ] [ ] [ ] [ ] [ ] [ ] [ ] [ ] [		[ ] [ ] [ ] [ ] [ ] [ ] [ ] [ ] [ ] [ ]	[ ] [ ] [ ] [ ] [ ] [ ] [ ] [ ] [ ] [ ]
	ROUTING/SIGNA	TURES	II	NITIALS		DA	TE
Craig Lutz, Enforcement Officer (6EN-HS)		EN-HS)	9			11-5	20-03
Scott McDonale	d, Attorney (6RC-E	.W)	Stm			11-2	0-03
Terry Sykes (6F	(C-EW)		43			11/2	0/03
Marvin Benton	Marvin Benton (6RC-EW)		ny5			- II /2	1/23
Cheryl Boyd (6	Cheryl Boyd (6RC-E)		246			12/7	107
Carol D. Peters-Wagnon, Chief (6EN-HS)		glo			11-2	0.03	
Mark W. Potts, Chief (6EN-H)		9	for		11-2	0-03	
Samuel Colema	in (6EN) 106 /	44	1	'	$\dashv$	1	
Scott McDonald (6RC-EW)			8	PM		12/8	103

NOTE: PLEASE RETURN THIS FOLDER TO THE ENFORCEMENT OFFICER AFTER FILING OF COMPLAINT/CACO.

12-0018

V 2144

Jackson

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DALLAS, TEXAS

EPA REGION VI

IN THE MATTER OF:

DRESSER, INC.,
DRESSER MEASUREMENT DIVISION
ALEXANDRIA, LOUISIANA

EPA I.D. NO. LAD071940233

RESPONDENT

RESPONDENT

S

DOCKET NO. RCRA-06-2003-0903

CONSENT AGREEMENT
AND FINAL ORDER

AND FINAL ORDER

I.

# PRELIMINARY STATEMENT

- 1. This proceeding for the assessment of civil penalties and compliance order was instituted by EPA pursuant to Section 3008 of the Resource Conservation and Recovery Act ("RCRA"), 42 U.S.C. § 6928, on June 18, 2003 by the filing of a Complaint, Compliance Order, and Notice of Opportunity for Hearing ("Complaint"). The Complaint charged the Respondent, Dresser, Inc., with violating RCRA and the regulations promulgated pursuant to RCRA.
- 2. The Respondent admits the jurisdictional allegations of the Complaint; however, the Respondent neither admits nor denies the specific factual allegations and conclusions of law contained in the Complaint or the Findings of Fact and Conclusions of Law contained in this Consent Agreement and Final Order ("CAFO"). The Complaint states a claim upon which relief may be granted.
- 3. The Respondent explicitly waives any right to contest the allegations and its right to appeal the proposed final order contained in this CAFO, and waives all defenses which have

been raised or could have been raised to the claims set forth in the Complaint.

- 4. This CAFO resolves those violations which were alleged in the Complaint.
- 5. The Respondent consents to the issuance of the CAFO hereinafter recited and consents to the assessment and payment of the stated civil penalty in the amount and by the method set out in this CAFO.

II.

# FINDINGS OF FACT AND CONCLUSIONS OF LAW

- 6. Dresser, Inc. ("Respondent") is a corporation incorporated under the laws of the State of Delaware and qualified to conduct business in the State of Louisiana.
  - 7. Respondent began doing business in the State of Louisiana in 1979.
- 8. Respondent is a corporation, and therefore is a "person" as that term is defined in Louisiana Administrative Code ("LAC") 33:V.109, Section 1004(15) of RCRA, 42 U.S.C. § 6903(15), and 40 Code of Federal Regulations ("C.F.R.") § 260.10.
- Respondent's Registered Agent for service is Corporation Service Company, 320
   Somerulos Street, Baton Rouge, Louisiana 70802-6129.
- 10. Respondent owns and operates a business that manufactures relief valves and safety valves, involving processes which include machining, welding, metal finishing, coating, assembly, and packaging. The business is located at the intersection of U.S. Highway 167 North and State Highway 3220 in Alexandria, Louisiana ("Facility").
- 11. Pursuant to Section 3010(a) of RCRA, 42 U.S.C. § 6930(a), on or about August 8, 1980, Respondent filed a Notification of Registration ("NOR") with the Louisiana Department of Environmental Quality ("LDEQ") as a Large Quantity Generator of Hazardous Waste. The

Respondent's Facility was assigned the EPA Identification Number LAD071940233.

- 12. For purposes of this CAFO, the term "Hazardous Waste" shall mean "Hazardous Waste" as defined at LAC 33:V.109 [40 C.F.R. § 261.3].
- 13. The Respondent's Facility is a "facility" as that term is defined at LAC 33:V.109 [40 C.F.R. § 260.10].
- 14. The Respondent is a "generator" of hazardous waste as that term is defined at LAC 33:V.109 [40 C.F.R. § 260.10].
- 15. Pursuant to Section 3007(a) of RCRA, 42 U.S.C. § 6927(a), EPA representatives conducted a Compliance Evaluation Inspection ("Inspection") at Respondent's Facility on June 14, 2001.

# RCRA VIOLATIONS ALLEGED

COUNT I - HAZARDOUS WASTE STORAGE AREA:
OPERATING A HAZARDOUS WASTE STORAGE FACILITY WITHOUT INTERIM
STATUS OR PERMIT IN VIOLATION OF 40 C.F.R. §§ 270.1 AND 270.10, AND RCRA
SECTION 3005(a), BY FAILING TO MEET THE EXEMPTION REQUIREMENTS OF LAC
33:V Subpart 1 [40 C.F.R. § 262.34]

- 16. Pursuant to LAC 33:V Subpart 1 [40 CFR §§ 270.1 and 270.10] and RCRA Section 3005, the storage of hazardous waste is prohibited without a permit or interim status.
- 17. During the Inspection, EPA representatives observed, documented, and photographed four (4) drums of material situated in the Facility's designated hazardous waste storage area with accumulation start-dates marked as January 2, 2001. These drums had remained on-site in excess of the allowed ninety (90) day storage period.
  - 18. Pursuant to LAC:V.1109.E.2 [40 C.F.R. § 262.34(a)] generators of hazardous waste

are allowed to store waste on-site for ninety days without a permit or interim status, in accordance with LAC 33:V Subpart 1 [40 C.F.R. §§ 270.1 and 270.10]. A generator who accumulates hazardous waste on-site for more than ninety (90) days is considered an operator of a hazardous waste storage facility and is subject to the requirements of 40 C.F.R. parts 264 and 265 and the permit requirements of 40 C.F.R. part 270, unless the generator has been granted an extension to the 90-day period.

- 19. Therefore, based on the above, Respondent violated LAC 33:V Subpart 1 [40 C.F.R. §§ 270.1 and 270.10] and RCRA Section 3005 by storing hazardous waste for longer than ninety (90) days without a permit or interim status.
- COUNT II SATELLITE ACCUMULATION CONTAINER:

  OPERATING A HAZARDOUS WASTE STORAGE FACILITY WITHOUT INTERIM
  STATUS OR PERMIT IN VIOLATION OF 40 C.F.R. §§ 270.1 AND 270.10, AND RCRA
  SECTION 3005(a), BY FAILING TO MEET THE EXEMPTION REQUIREMENTS OF LAC
  33:V Subpart 1 [40 C.F.R. § 262.34]
- 20. During the Inspection, EPA representatives observed, documented, and photographed a satellite container accumulating used sandblasting materials. Facility personnel stated to the EPA representatives at the time of the inspection that the Facility classified said sandblasting waste as a D008 hazardous waste which exhibits the characteristic of toxicity for lead, as defined at LAC:V.4903.E.2 [40 C.F.R. § 261.24]. Respondent failed to properly label and identify the contents of said container.
- 21. Pursuant to LAC:V.1109.E.4 [40 C.F.R. § 262.34(c)] a generator is allowed to accumulate as much as fifty-five (55) gallons of hazardous waste in containers at or near the point of generation without a permit or interim status, provided that the generator clearly marks the containers with the words "Hazardous Waste" or other words that identify the contents of the

container. Respondent does not have a RCRA permit, nor is the Facility operating under interim status.

22. Therefore, based on the above, Respondent violated LAC:V.1109.E.4 [40 C.F.R. § 262.34(c)] by failing to mark the container accumulating used sandblasting material with the words "Hazardous Waste" or other words that identify the contents. Thus, Respondent failed to meet the exemption requirements of 40 C.F.R. § 262.34, and stored hazardous waste without a permit or interim status in violation of 40 C.F.R. §§ 270.1 and 270.10, RCRA Section 3005(a), and LAC 33:V Subpart 1.

# COUNT III - FAILURE TO MAKE A HAZARDOUS WASTE DETERMINATION AS REQUIRED BY LAC 33:V.1103 [40 C.F.R. § 262.11]

- 23. During the Inspection, representatives of the Facility stated that a lacquer thinner (Sherwin-Williams Sol-Lac RK120) was used as a solvent for cleaning paint guns at the Facility. Facility personnel stated to EPA representatives that the Facility classified the waste generated by the paint gun cleaning process as a D001 hazardous waste which exhibits the characteristic of ignitability, as regulated by LAC:V.4903.B [40 C.F.R. § 261.21]. A review of the Material Safety Data Sheet (MSDS) shows that said lacquer thinner contains thirteen percent (13%) toluene by weight which is twelve percent (12%) toluene by volume.
- 24. Pursuant to LAC:V.4901.B.1 [40 C.F.R. § 261.31] spent toluene, a non-halogenated solvent, contains ten percent (10%) or more toluene by volume (before use) and is thereby listed as a hazardous waste with the EPA (Hazardous Waste No. F005).
- 25. Pursuant to LAC:V.1103.B [40 C.F.R. § 262.11(b)] a person who generates a solid waste must first determine if that waste is a listed hazardous waste, in accordance with LAC:V

Chapter 49 [40 C.F.R. § 261, Subpart D].

- 26. Therefore, based on the above, Respondent violated LAC:V.1103 [40 C.F.R. § 262.11] by failing to first determine that the solid waste was a listed hazardous waste generated from the paint gun cleaning process, as set forth under LAC:V Chapter 49 [40 C.F.R. § 261, Subpart D].
- COUNT IV FAILURE TO COMPLY WITH USED OIL STORAGE REQUIREMENTS BY ACCUMULATING USED OIL IN VIOLATION OF LAC:V.4301 [40 C.F.R. § 279.22]
- 27. Pursuant to 40 CFR § 279.22, which is adopted by reference in LAC:V.4301, "containers and above ground tanks used to store used oil at generator facilities must be in good condition (no severe rusting, apparent structural defects or deterioration); not leaking (no visible leaks); and must be labeled or clearly marked with the words "Used Oil."
- 28. During the Inspection, EPA representatives observed, documented, and photographed five (5) tanks labeled as "Waste Oil". Facility personnel stated that the material stored in the tanks was wastewater containing an alkaline based cleaner and a paraffinic machine cutting oil. The Respondent further stated that the material was collected and sent to a fuel-blending facility.
- 29. The material stored in the tanks labeled "Waste Oil" is a used oil, as defined by LAC:V.4001 [40 C.F.R. § 279.1]. Used oil is any oil which has been refined from crude oil and subsequently used. As a result of such use, used oil is contaminated by physical or chemical impurities.
- 30. Respondent stored machine cutting oil and cleaner with wastewater in said tanks.

  The combined mixture of these constituents constitutes a material which meets the definition of used oil.

- 31. Generators are a required by LAC:V.4301.C.1 [40 C.F.R. § 279.22(c)] to label containers and tanks containing used oil with the words "Used Oil".
- 32. Respondent violated LAC:V.4301.C.1 [40 C.F.R. § 279.22(c)] by failing to label the tanks containing used oil with the words "Used Oil".
- 33. Therefore, based on the above, Respondent violated LAC:V.4301 [40 C.F.R. § 279.22], by failing to comply with used oil storage requirements.

### III.

# RCRA COMPLIANCE ORDER

- 34. Pursuant to Section 3008(a) of RCRA, 42 U.S.C. § 6928(a), the Respondent is hereby **ORDERED** to take the following actions and provide evidence of compliance within the time period specified below:
- A. Respondent shall immediately cease unauthorized storage of hazardous waste and transport off-site any hazardous waste stored on-site in excess of ninety (90) days. Respondent shall provide documentation to EPA and LDEQ demonstrating that all hazardous waste accumulated on-site without a permit or without having interim status remains on-site for no more than ninety (90) days, pursuant to LAC:V.1109.E.2 [40 C.F.R. § 262.34(a)], and 40 C.F.R. parts 264, 265, and 270.
- B. Respondent shall immediately label or mark each container accumulating hazardous waste at or near the point of generation with the words "Hazardous Waste" or other words to identify the contents, pursuant to LAC:V.1109.E.4 [40 C.F.R. § 262.34(c)].
- C. Respondent shall immediately label and clearly mark each container and/or tank used for the storage of used oil with the words "Used Oil", pursuant to LAC:V.4301.C.1 [40]

C.F.R. § 279.22(c)].

- D. If Respondent fails to comply with the actions ordered in paragraphs A through C (above) upon receipt of this CAFO, then Respondent shall immediately cease storage of all hazardous waste at the Facility until a hazardous waste storage permit has been applied for, approved, and obtained by Respondent.
- E. No later than thirty (30) days after the effective date of this Compliance Order, Respondent shall submit to EPA a written certification that the actions ordered in paragraphs A through C (above) have been completely satisfied.
- F. No later than sixty (60) days after the effective date of this Compliance Order, Respondent shall provide to EPA an itemized expense sheet listing costs incurred by Respondent in association with compliance of the requirements set forth in paragraphs A through C (above), including quantity and disposal costs for removal of the waste located in the Facility's hazardous waste storage areas.
- G. In all instances in which this CAFO requires written submissions to EPA, each submission must be accompanied by the following certification signed by a "responsible official":

I certify that the information contained in or accompanying this submission is true, accurate and complete. As to those identified portions of this submission for which I cannot personally verify the truth and accuracy, I certify as the company official having supervisory responsibility for the person(s) who, acting upon my direct instructions, made the verification, that this information is true, accurate, and complete.

For the purpose of this certification, a "responsible official" of a Respondent means a person with the authority to bind the Respondent as to the truth, accuracy, and completeness of

all certified information.

H. All documents required under this CAFO shall be sent to the following persons:

Carol Peters-Wagnon, Chief RCRA Enforcement Branch ALONM Section (6EN-HS) U.S. EPA - Region 6 1445 Ross Avenue Dallas, TX 75202-2733

Scott McDonald (6RC-EW) Office of Regional Counsel U.S. EPA - Region 6 1445 Ross Avenue Dallas, TX 75202-2733

Peggy Hatch, Administrator Enforcement Division Louisiana Department of Environmental Quality Office of Environmental Compliance P.O. Box 82215 Baton Rouge, LA 70884-2215

IV.

# SUPPLEMENTAL ENVIRONMENTAL PROJECT

35. Respondent agrees to undertake a supplemental environmental project ("SEP"), which the parties agree is intended to secure significant environmental or public health protection and improvement. The SEP shall replace the current zinc phosphating line process with a new "black oxide" process involving a closed loop system at Respondent's Facility located at the intersection of U.S. Highway 167 North and State Highway 3220 in Alexandria, Louisiana. This SEP is designed to reduce waste and elimate hazardous waste stream D002 (corrosive acid and alkaline wastewater solutions) generated on-site by Respondent's zinc phosphating process.

Thus, the SEP falls within the category of 'waste reduction', as set forth in EPA's SEP Policy.

The SEP satisfies the required 'nexus' to the violations alleged in the Complaint because the implementation of the SEP will address hazardous waste management and storage procedures at the Facility:

- A. Respondent's total expenditures for the SEP shall not be less than THIRTY-FIVE THOUSAND DOLLARS (\$35,000).
- B. Respondent shall undertake and complete SEP activities to the satisfaction of EPA pursuant to the terms and conditions set forth in this CAFO and the SEP Scope of Work ("SEPSOW"). The SEPSOW is attached to this CAFO as Appendix A and incorporated by reference. Respondent shall take the following actions:
  - i. Within forty-five (45) days after receipt of the filed CAFO, Respondent shall submit a sufficient Implementation Plan to EPA for review and comment. The Implementation Plan is subject to EPA approval in accordance with the terms of the CAFO and shall be prepared in accordance with the SEPSOW.
  - ii. Within sixty (60) days after receipt of EPA's 'notification of approval' of the Implementation Plan, Respondent will undertake said activities pursuant to the Implementation Plan.

# IMPLEMENTATION PLAN

- 36. Respondent shall undertake and complete the SEP in accordance with the terms of the CAFO and SEPSOW.
- 37. Respondent shall submit quarterly progress reports to EPA in accordance with the SEPSOW. The quarterly progress reports are due on the tenth (10) day of every third month

after the effective date of this CAFO.

- 38. Respondent shall complete the SEP project within eighteen (18) months of the effective date of this CAFO.
- 39. No later than sixty (60) days after Respondent has completed the SEP, Respondent shall submit a SEP Closure Report.
- 40. EPA will review the Implementation Plan, and if applicable, the Closure Report, included in Appendix A, submitted by Respondent pursuant to the CAFO and SEPSOW. EPA will provide written approval or disapproval with comments regarding the Implementation Plan and Closure Report (hereinafter referred to as "SEPSOW Plan") submitted by Respondent.
- 41. Within thirty (30) days of receipt of EPA's disapproval of a SEPSOW Plan,
  Respondent shall revise the SEPSOW Plan in accordance with EPA's comments and shall submit
  a revised SEPSOW Plan to EPA. EPA will respond in writing by approving or disapproving the
  plan with comments. If the revised SEPSOW Plan is again disapproved by EPA, the Respondent
  shall present another revised SEPSOW Plan withing twenty (20) days of EPA's second
  disapproval. EPA will approve or disapprove in writing the second revised submittal.
- 42. Any SEPSOW Plan, approved in writing by EPA, shall be deemed incorporated into this CAFO. Within thirty (30) days of approval of the specific SEPSOW Plan, Respondent shall commence work by implementing the tasks set forth in the approved SEPSOW Plan, pursuant to the Scope of Work Section contained in the SEPSOW. All work shall be conducted in accordance with the standards, specifications, and schedules set forth in the approved SEPSOW Plan. Any non-compliant activities shall be considered a violation of the terms of this CAFO and subject to the stipulated penalties outlined in Section VII of this CAFO.

- 43. Oral advice or approval given by EPA representatives will not constitute official approval, nor shall any oral assurance.
- 44. Respondent hereby agrees not to claim funds expended in the performance of the SEP as a deductible business expense for purposes of federal taxes. In addition, Respondent hereby agrees that, within thirty (30) days of the date it submits its federal tax reports for the calender year in which the above-identified SEP is completed, it will submit to EPA certification that any funds expended in the performance of this SEP have not been deducted from federal taxes.
- 45. Nothing herein shall obligate Respondent to publicize its involvement in the SEP; however, any public statement, oral or written, made by Respondent to publicize its participation in SEP activities shall include the following language: "This project was undertaken in connection with the settlement of an enforcement action taken by the U.S. Environmental Protection Agency for violations of RCRA provisions."

V.

### PENALTY ORDER

46. Pursuant to the authority granted in Section 3008 of RCRA, 42 U.S.C. § 6928, and upon consideration of the entire record herein, including the above referenced Findings of Fact and Conclusions of Law, which are hereby adopted and made a part hereof, and upon consideration of the seriousness of the alleged violations, good faith efforts to comply with the applicable regulations, and the October 1990 RCRA Civil Penalty Policy, Respondent agrees to pay a civil penalty in the amount of TWO THOUSAND FIVE HUNDRED AND THREE DOLLARS (\$2,503.00).

- 47. In the event that Respondent pays the agreed civil penalty stated above (\$2,503.00), but fails to perform the SEP described herein, then Respondent shall pay an additional civil penalty in the amount of SEVEN THOUSAND FIVE HUNDRED AND SEVEN DOLLARS (\$7507.00).
- 48. The agreed civil penalty shall be paid by mailing a cashier's check or certified check payable to the Treasurer of the United States of America, within thirty (30) days of the effective date of this CAFO, to the following address:

Regional Hearing Clerk (6C) U.S. EPA, Region 6 P.O. Box 360582M Pittsburgh, Pennsylvania 15251

The case name and docket number (In the Matter of Dresser, Inc., Docket No. RCRA-06-2003-0903) shall be clearly typed on the check to ensure proper credit.

49. Respondent shall send a simultaneous notice of such payment, including a copy of the cashier's check or certified check to the following:

Lorena Vaughn Regional Hearing Clerk (6RC) U.S. EPA - Region 6 1445 Ross Avenue Dallas, TX 75202-2733

Carol Peters-Wagnon, Chief RCRA Enforcement Branch ALONM Section (6EN-HS) Compliance Assurance and Enforcement Division U.S. EPA - Region 6 1445 Ross Avenue Dallas, TX 75202-2733 Scott McDonald (6RC-EW) Office of Regional Counsel U.S. EPA - Region 6 1445 Ross Avenue Dallas, TX 75202-2733

Your adherence to this request will ensure proper credit is given when penalties are received in the EPA Regional Office.

50. Pursuant to 31 U.S.C. § 3717 and 40 C.F.R. § 13.11, unless otherwise prohibited by law, EPA will assess interest and late payment penalties on outstanding debts owed to the United States and a charge to cover the costs of processing and handling a delinquent claim. If payment is not timely made, interest shall accrue from the date payment is due and until the payment is made. Interest will be assessed at the rate of the United States Treasury tax and loan rate in accordance with 40 C.F.R. § 13.11(a). Moreover, the costs of the Agency's administrative handling of overdue debts will be charged and assessed monthly throughout the period the debt is overdue. 40 C.F.R. § 13.11(b). EPA will also assess a \$15.00 administrative handling charge for administrative costs on unpaid penalties for the first thirty (30) day period after the payment is due and an additional \$15.00 for each subsequent thirty (30) days the penalty remains unpaid. In addition, a penalty charge of up to six percent per year will be assessed monthly on any portion of the debt which remains delinquent more than ninety (90) days. 40 C.F.R. § 13.11(c). Should assessment of the penalty charge on the debt be required, it shall accrue from the first day payment is delinquent. 31 C.F.R. § 901.9(d). Other penalties for failure to make a payment may also apply.

# PARTIES BOUND

51. The provisions of this CAFO shall apply to and be binding upon the parties to this action, their officers, directors, agents, employees, successors, and assigns. The undersigned representative of each party to this CAFO certifies that he or she is fully authorized by the party whom he or she represents to enter into the terms and conditions of this CAFO and to execute and to legally bind that party to it.

### VII.

# STIPULATED PENALTIES

52. In addition to any other remedies or sanctions available to EPA, if the Respondent fails or refuses to comply with any provision of this CAFO, the Respondent shall pay stipulated penalties in the following amounts for each day during which each failure or refusal to comply continues:

Period of Failure to Comply	Penalty Per Violation Per Day			
1st through 15th day	\$1,000.00			
16th through 30th day	\$5,000.00			
31st day and beyond	\$10,000.00			

Penalties shall accrue from the date of the noncompliance until the date the violation is corrected, as determined by EPA.

53. The payment of stipulated penalties shall be made by mailing a cashier's check or certified check payable to the Treasurer of the United States, within thirty (30) days of receipt of a demand letter for payment to the following address:

Regional Hearing Clerk (6C) U.S. EPA, Region 6 P.O. Box 360582M Pittsburgh, PA. 15251

The case name and docket number (In the Matter of Dresser, Inc., Docket No. RCRA 06-2003-0903 shall be clearly typed on the check to ensure proper credit. The Respondent shall send simultaneous notices of such payments, including copies of the cashier's check or certified check to the following:

Lorena Vaughn Regional Hearing Clerk (6RC) U.S. EPA - Region 6 1445 Ross Avenue Dallas, TX 75202-2733

Carol Peters-Wagnon, Chief RCRA Enforcement Branch ALONM Section (6EN-HS) Compliance Assurance and Enforcement Division U.S. EPA - Region 6 1445 Ross Avenue Dallas, TX 75202-2733

Scott McDonald (6RC-EW) Office of Regional Counsel U.S. EPA - Region 6 1445 Ross Avenue Dallas, TX 75202-2733

Adherence to these procedures will ensure proper credit when payments are received. Interest on stipulated penalties shall begin to accrue upon receipt of the demand letter, and will be recovered by EPA on any amount of the stipulated penalty not paid within thirty (30) days of receipt of the demand letter. In addition, the provisions of Section V concerning interest, penalties, and administrative costs also apply.

- 54. In addition to the stipulated penalties set forth above, EPA specifically reserves the right to seek other remedies or sanctions available to the EPA by reason of the Respondent's failure to comply with the requirements of this CAFO, including sanctions that EPA may seek under Section 3008 of RCRA, 42 U.S.C. § 6928.
- 55. If the Respondent disputes the basis for imposition of stipulated penalties, the issue shall be resolved under the Dispute Resolution procedures of this CAFO. All stipulated penalties shall continue to accrue through the period that dispute resolution is ongoing. Invoking dispute resolution shall not stay the accrual of stipulated penalties; however, the obligation to pay shall be stayed pending resolution of the dispute.

#### VIII.

# DISPUTE RESOLUTION

56. If the Respondent objects to any decision or directive of EPA in regard to Sections II, III, IV, or V, the Respondent shall notify the following persons in writing of its objections, including the basis for those objections, within fifteen (15) calendar days of receipt of EPA's decision or directive:

Carol Peters-Wagnon, Chief RCRA Enforcement Branch ALONM Section (6EN-HS) Compliance Assurance and Enforcement Division U.S. EPA - Region 6 1445 Ross Avenue Dallas, TX 75202-2733

Scott McDonald (6RC-EW) Office of Regional Counsel U.S. EPA - Region 6 1445 Ross Avenue Dallas, TX 75202-2733

- 57. The RCRA Enforcement Branch Chief or his designee (Branch Chief), and the Respondent shall then have an additional fifteen (15) calendar days from EPA's receipt of the Respondent's written objections to attempt to resolve the dispute. If an agreement is reached between the Branch Chief and the Respondent, the agreement shall be reduced to writing and signed by the Branch Chief and the Respondent and incorporated by reference into this CAFO.
- 58. If no agreement is reached between the Branch Chief and the Respondent within that time period, the dispute shall be submitted to the Director of the Compliance Assurance and Enforcement Division or his designee (Division Director). The Division Director and the Respondent shall then have a second 15-day period to resolve the dispute. If an agreement is reached between the Division Director and the Respondent, the resolution shall be reduced to writing and signed by the Division Director and Respondent and incorporated by reference into this CAFO. If the Division Director and the Respondent are unable to reach agreement within this second 15-day period, the Division Director shall provide a written statement of EPA's decision to the Respondent, which shall be binding upon the Respondent and incorporated by reference into the CAFO.
- 59. If the Dispute Resolution process results in a modification of this CAFO, the modified CAFO must be approved by the Regional Judicial Officer and filed pursuant to Section X (Modifications).

#### IX.

### NOTIFICATION

60. Unless otherwise specified elsewhere in this CAFO, whenever notice is required to be given, whenever a report or other document is required to be forwarded by one party to

another, or whenever a submission or demonstration is required to be made, it shall be directed to the individuals specified below at the addresses given (in addition to any action specified by law or regulation), unless these individuals or their successors give notice in writing to the other parties that another individual has been designated to receive the communication:

EPA:

Carol Peters-Wagnon, Chief RCRA Enforcement Branch ALONM Section (6EN-HS)

Compliance Assurance and Enforcement Division

U.S. EPA - Region 6 1445 Ross Avenue Dallas, TX 75202-2733

Respondent:

Peter M. Reynolds

Assistant General Counsel

Dresser, Inc.

15455 Dallas Parkway Addison, TX 75001

X.

### MODIFICATION

61. The terms, conditions, and compliance requirements of this CAFO may not be modified or amended except upon the written agreement of both parties, and approved by a Regional Judicial Officer, and such modification or amendment being filed with the Regional Hearing Clerk.

XI.

# RETENTION OF ENFORCEMENT RIGHTS

- 62. EPA does not waive any rights or remedies available to EPA for any other violations by the Respondent of Federal or State laws, regulations, or permitting conditions.
  - 63. Except as specifically provided in this CAFO, nothing herein shall limit the power

and authority of EPA or the United States to take, direct, or order all actions to protect public health, welfare, or the environment, or prevent, abate, or minimize an actual or threatened release of hazardous substances, pollutants, contaminants, hazardous substances on, at or from Respondent's Facility. Furthermore, nothing in this CAFO shall be construed to prevent or limit EPA's civil and criminal authorities, or that of other Federal, State, or local agencies or departments to obtain penalties or injunctive relief under other Federal, State, or local laws or regulations.

### XII.

# **INDEMNIFICATION OF EPA**

64. Neither EPA nor the United States Government shall be liable for any injuries or damages to person or property resulting from the acts or omissions of the Respondent, their officers, directors, employees, agents, receivers, trustees, successors, assigns, or contractors in carrying out the activities required by this CAFO, nor shall EPA or the United States Government be held out as a party to any contract entered into by the Respondent in carrying out the activities required by this CAFO.

### XIII.

# RECORD PRESERVATION

65. The Respondent shall preserve, during the pendency of this CAFO, all records and documents in its possession or in the possession of its divisions, employees, agents, contractors, or successors which in any way relate to this CAFO regardless of any document retention policy to the contrary.

### COSTS

66. Each party shall bear its own costs and attorney's fees. Furthermore, Respondent specifically waives its right to seek reimbursement of its costs and attorney's fees under the Equal Access to Justice Act (5 U.S.C. § 504), as amended by the Small Business Regulatory Enforcement Fairness Act (P.L. 104-121), and any regulations promulgated pursuant to those Acts.

### XV.

### **TERMINATION**

67. At such time as the Respondent believes that it has complied with all terms and conditions of this CAFO, it may request that EPA concur whether the requirements of this CAFO have been satisfied. Such request shall be in writing and shall provide the necessary documentation to establish whether there has been full compliance with the terms and conditions of this CAFO. EPA will respond to said request in writing within 90 days of receipt of the request. This CAFO shall terminate when all actions required to be taken by this CAFO have been completed, and the Respondent has been notified by the EPA in writing that this CAFO has been satisfied and terminated.

### XVI.

# EFFECTIVE DATE

This CAFO, and any subsequent modifications, become effective upon filing with the Regional Hearing Clerk.

THE UNDERSIGNED PARTIES CONSENT TO THE ENTRY OF THIS CONSENT AGREEMENT AND FINAL ORDER:

FOR THE RESPONDENT

Date: 11-11-03

Representative of Dresser, Inc.

John Richard Featen

V.P. 7 Gen. Mayr.

Pressure Relief Values.

FOR THE COMPLAINANT:

Date! 2-4-2003

Samuel Coleman, P.E.

Director

Compliance Assurance and

**Enforcement Division** 

U.S. Environmental Protection Agency

Region 6

This Consent Agreement and Final Order is hereby adopted and issued pursuant to Section 3008 of RCRA, 42 U.S.C. § 6928, and the Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties, 40 C.F.R. Part 22.

It is so ORDERED. This Order shall become effective immediately upon filing with the Regional Hearing Clerk.

Date: 12 15 2003

Regional Judicial Officer

# CERTIFICATE OF SERVICE

I hereby certify that on the Aday of Decit, 2003, the original of the foregoing Consent Agreement and Final Order (CAFO) concerning Dresser, Inc., Docket No. RCRA-06-2003-0903, was hand delivered to the Regional Hearing Clerk, U.S. EPA - Region 6, 1445 Ross Avenue, Dallas, Texas 75202-2733, and that a true and correct copy of the CAFO was sent to the following by the method identified below:

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Peter M. Reynolds Assistant General Counsel Dresser, Inc. 15455 Dallas Parkway Addison, TX 75001

Corporation Service Company Registered Agent 320 Somerulos Street Baton Rouge, Louisiana 70802-6129



Monday, July 14, 2003

Environmental Protection Agency Region VI 1445 Ross Avenue Suite 1200 Dallas, Texas 75202-2733

Attn. Craig Lutz

day (214) 665-72 64

Dear Mr. Lutz,

On behalf of Dresser, we appreciate the opportunity to meet with you last week. Pursuant to your request are summaries of the three (3), proposed Supplemental Environmental Projects (SEP's) for your review. For each project, a schedule allowing for completed project, manufacturing engineering review, product-engineering review's to finalize the project, and then complete a budget/capital request for funding, will be needed.

Each SEP was addressed with the questions you had in the April 30, 2003 letter.

SEP- Proposal no. 1 – Lead seals elimination: (2 pages)

The lead seals project is in the final stages of completion. We were willing to take the extra step.

SEP- Proposal no. 2 – Elimination of zinc phosphating process: (2 pages)

The replacement of "zinc phosphating process," with a "black oxide" TRU-TEMP process that generates no hazardous waste and a closed loop system. The initial safety, health, and hazard communications review is in progress, and a complete design drawing, product evaluation, and engineering review for acceptance are being worked on. Once the SEP review is complete, we will need about two (2) months to finalize a formal SEP submission per the EPA SEP policy.

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This training will be held in conjunction with our Emergency Response Team training and will familiarize the AVFD personnel with our facility and the needs to reduce environmental exposure as much as possible with our sacrifice to human life needs first.

Once the SEP review is complete it would take about one (1) month to complete a final agenda for this training in conjunction with the ERT training for 80 hours of total training time.

A review of the MODEL SEP CAFO was found at the site address Scott McDonald had supplied and we are going in this direction, as we would like to continue to work with you to address this matter through a consent order

Since these are in the draft format also don't mind advising of any area not addressed. We would be pleased to provide more detail as needed.

Terry A. Turner

Copy:

Curt Hensley

Ralph Foster Peter Reynolds

Scott McDonald

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#### DRAFT

Supplemental Environmental Plan (SEP)- Proposal #1 - Elimination of lead seals from valve production:

Project Implementation- after the June 14, 2001 EPA inspection and the Dec. 2002 informational request booklet supplied to EPA, a decision was made to eliminate the lead seals from a long standing way of sealing completed valves after test. The process was changed to aluminum seals, which are environmentally friendly and can withstand the high temperatures and environment our valves are subjected to. This project removed 9,850 lbs. of lead from our process.

1. Explain how the proposed SEP will improve, protect, or reduce risk to public health or the environment.

The elimination of lead seals benefits (protects) the environment from another source of lead that could end up in trash piles at Dresser Flow Control, storm water or cooling water and lakes, at our facility and facilities around the world.

2. Explain the relationship between the alleged violations and the proposed project.

This project has eliminated the D008 hazardous waste stream and a toxic material environmentally, and maintains the integrity of the plant trash incineration system as a non-hazardous incinerator for the intended reduction of plant trash by a 100:1 ratio and is not a health concern to our employees.

- 3. Provide details of project:
- a. Project Details: The whole sealing process had to be reviewed with several different materials. Aluminum was the best, the most economical, and an environmentally friendly product that would withstand the high temperatures and exposure incurred in power and petro-chemical plants for safety valves. (SV, SRV, POSRV, RV):
- b. No capital cost required:
- c. Operational cost Aluminum seals, grippers (Pliers with stamps) had to be changed out, and ergonomically reviewed, as the pressure to trademark aluminum was more, and required a new trademark as the space and pressure applied to trademark stamp, were changed when we moved from lead to aluminum seals.
- d. One time cost incurred to make change:

1. Product engineering approx. 30 hours of time to research and recommend: X100	\$3,000
2. Change over and registration of new trademark from (Dresser to CN)	18,000
(Legal, engineering, and trademark application process)	
3. Manufacturing engineering to set up process change and to change standards, cost	
and implement engineering drawings changes 35 hours of time X 75	2,625
4. Purchasing set up new vendor, part no. and purchase orders: 15 hours X 65	975
5. Plant engineering to set up removal, ship to customers 24,000 lead seal to Saudi Ara	bia
and remove all lead from valve sealing areas and set up new containers for Aluminu	m seals
20 hours of time X 65	\$1300
6. 25 new crimping tools	\$5,000
7. Now updating all environmental forms for State and EPA by plant engineering	0.400
- 30 hours of time x 65	\$1,950
8. Management time for reviews and implementation of change – 20-hours $\times$ 125	\$2,500
Project implementation total	\$35,350

4. Identify the categories from the EPA SEP Projects policy that your proposed project can qualify as a SEP under.

Category 2: Pollution Prevention - From SEP project definition categories:

"Source reduction" The elimination of lead seals as a part of the valve manufacturing process has eliminated a toxic material at the point of generation, and protects natural resources with the elimination of approximately 9,850 lbs. of lead that is annually released to the environment.

Time line:

This was implemented in April 2003 due to effort and continual push by management to make this happen as a major project among many other daily manufacturing and product demands to keep the operations going.

The formulation of this project into a formal SEP with drawings, time lines, definitions, and project audits to complete the EPA Supplemental Environmental Projects Policy would take approx. 3 months: Estimated Oct. 2003 end of month completion of all documentation and submittal:

Summary:

We are requesting consideration for this project as a SEP due to the positive impact it will have on the elimination of lead both here at the Dresser Flow Control Alexandria, Louisiana plant and around the world for our customers.

Supplemental Environmental Plan (SEP)- Proposal #2 – Zinc Phosphating process change: (SEP for Dresser Flow Control, Alex. La Plant Only)

Project Proposal --- To change out the existing zinc phosphate process, (which generates the D002 hazardous waste acid water and the hazardous waste alkaline water solutions - highly corrosive): Proposal is to change to a "Birchwood Casey" Tru-temp 190 deg. F black oxide coating which is environmentally friendly and generates no hazardous waste, and to also make this a closed loop system.

1. Explain how the proposed SEP will improve, protect, or reduce risk to public health or the environment.

The reduction of all hazardous waste generation from this process would be eliminated; the capture of hazardous waste D002, and the accumulation, and disposal of this D002 waste stream would be eliminated:

Elimination of worker handling and transportation of this hazardous waste on US highways would be an environmental benefit.

2. Explain the relationship between the alleged violations and the proposed project

The 55-gallon drums that were the subject of the compliance order would be eliminated, as there would be no hazardous waste generated from the proposed process.

3. Provide details of project:

This is where we are currently working on the cost, product acceptance "Black Oxide" as an acceptable replacement of zinc phosphating, working through product engineering, manufacturing engineering, and a hazard communications review of MSDS sheets, prior to any project definition finalization. We expect this evaluation to take approximately 12 weeks.

Initial plan of what is proposed for the "Birchwood Casey" product.

a. Requires adding two (2) additional dip tanks, and elementary pH neutralization system (s) and revamp of the existing dipping process, times, chemicals and steps. We can integrate four of the existing dip tanks into the process.

b. "Ball Park cost" That would require capital expenditure.

Added tanks (2)	2800 /ea. X2
Elementary pH neutralization system	3800/ea X2
Revamp of existing line to incorporate the added tanks	4800/ea
Electrical changes and addition of pH controls	2800/ea
Modification of existing spill containment pan	3200/ea
Initial chemicals charge (set up)	3800/ea
Planning, engineering, management (90)	7700/ea
Project projected total	\$35,500

c. Annual operational cost estimated, operator, maintenance, and chemicals:

Annua	projected total	\$21,500

d. Annual savings in hazardous waste disposal cost reduction:

Annual projected \$18,500

4. Identify the categories from the EPA SEP Projects policy that your proposed project can qualify as a SEP under.

Category 2: Pollution Prevention - From SEP project definition categories:

"Source reduction" The proposed project would reduce generation of highly corrosive hazardous waste acids, hazardous waste alkaline at point of generation.

Time lines and progress to date:

Product engineering/applications engineering has reviewed written literature on the "black oxide" process and have had one meeting with the "Birchwood Casey" sales rep and is requesting a formal recommendation and cost estimate of the products. We have gotten MSDS sheets on all but the equal for the tank #3 etching acid equal.

Internal hazard communications and safety committee personnel are reviewing MSDS sheets before recommending approval to proceed.

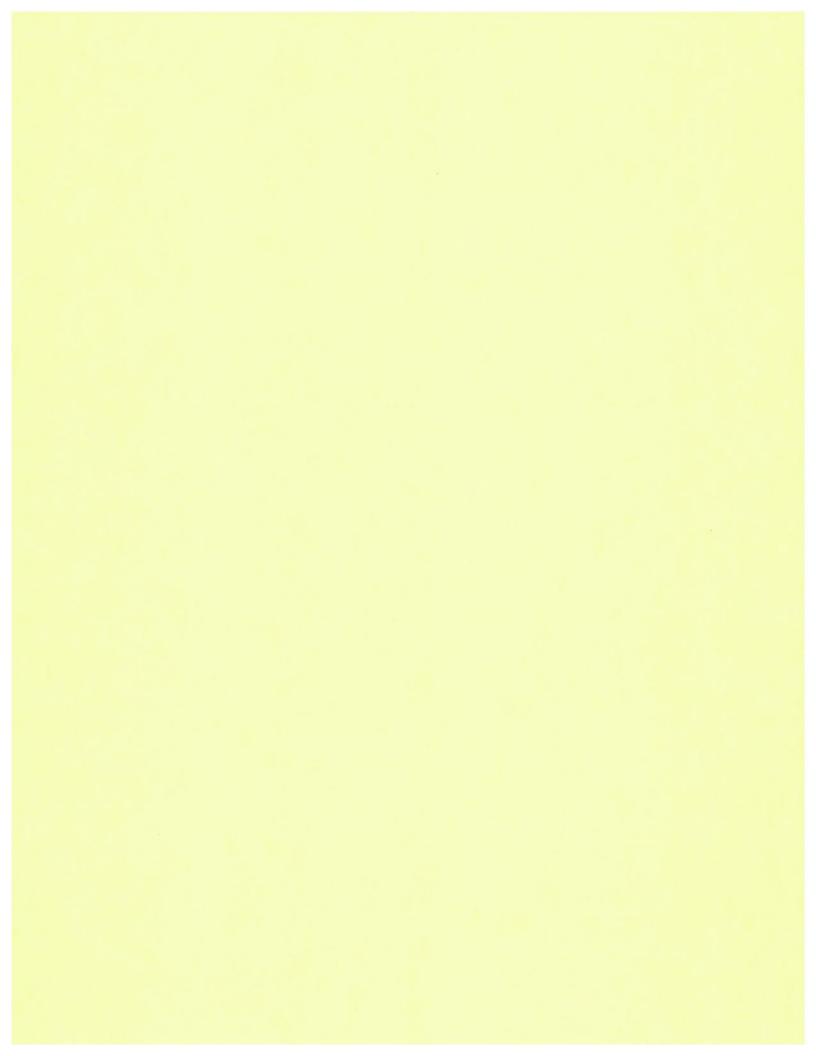
These two (2) above items should be completed in September 2003:

Then product engineering will set up and ship out valve parts for a "trail test" and then subject to an industry wide recognized "salt spray test":

If these results are approved then a project definition and production process change will be forwarded to manufacturing engineering to review cost and standards for changing to this process:

These two (2) items should be completed by Jan. 2004:

The whole project process change and implementation could possibly be completed by May 2004 if all above approved and "black oxide" coating proves to be a viable alternative to zinc phosphating:



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01-Oct-2003
\$25,027
\$7,302
\$32,329
\$32,329
10.9%
\$35,500
18-Jul-2003
1.7%
\$0
N/A
N/A
N/A
\$3,000
18-Jul-2003
1.7%
5

### RCRA 3008(a) FINAL CAFO SIGNATURE ROUTING SLIP

FACILITY NAME: Dresser Inc. ADDRESS: U.S. Highway 167 and State Highway 3220, Alexandria, Louisiana EPA I.D. NO.: LAD071904233 DOCKET NO .: RCRA-6-2003-0903 ENF. OFFICER: Craig Lutz ATTORNEY: Scott McDonald CHECKLIST: YES NO **AVAILABLE** N/A 1. CASE SUMMARY 2. FACT SHEET [X]3. TRANSMITTAL LETTER [X] 4. COMPLAINT 5. CAFO [X] CERTIFICATE OF SERVICE 6. [X] 7. S.E.C. NOTIFICATION [] 8. **6EN SETTLEMENT STRATEGY** [X]9. JUSTIF. OF SETTLEMENT PENALTY [X]10. ORIGINAL PENALTY COMPUTATION [X]11. PEER REVIEW DOCUMENTATION 12. SEP FACT SHEET [X] 13. SEP DOCUMENTATION [X]CASE CONCLUSION DATA SHEET 14. [X]15. BEN/ABLE/PROJECT PRINTOUT [X]16. RCRA INFO DATA INPUT [X] 17. OTHER PERTINENT CASE DOC.'S 

ROUTING/SIGNATURES	INITIALS	DATE
Craig Lutz, Enforcement Officer (6EN-HS)	Q_	9/11/03
Scott McDonald, Attorney (6RC-EW)	SFM	9/11/03
Terry Sykes (6RC-EW)	72	9/11/03
Marvin Benton (6RC-EW)	JS	9/11/03
.Cheryl Boyd (6RC-E)	243	9/12/03
Carol D. Peters-Wagnon, Chief (6EN-HS)	COPIN	9/12/03
Mark W. Potts, Chief (6EN-H)	copn	9/12/03
Scott McDonald (6RC-EW)	SPM	9/15/03
	p.	

NOTE: PLEASE RETURN THIS FOLDER TO THE ENFORCEMENT OFFICER AFTER FILING OF COMPLAINT/CACO.

# CERTIFIED MAIL - RETURN RECEIPT REQUESTED ARTICLE NUMBER

Peter M. Reynolds, Esq. Assistant General Counsel Dresser, Incorporated 15455 Dallas Parkway Addison, TX 75001

Re: Dresser, Inc., Dresser Measurement Division (Alexandria, Louisiana)

Docket No. RCRA-06-2003-0903 EPA I.D. No. LAD071940233

Dear Mr. Reynolds:

The U.S. Environmental Protection Agency ("EPA") previously issued a Complaint, Compliance Order, and Notice of Opportunity for Hearing ("Complaint") against Dresser, Inc. ("Dresser"). The Complaint was filed on June 18, 2003 with the Regional Hearing Clerk, in which Resource Conservation and Recovery Act violations were alleged. As you know, a settlement in principal has been reached between Dresser and EPA regarding the alleged violations. The terms and conditions of the settlement are specified in the enclosed Consent Agreement and Final Order ("CAFO").

Please review the enclosed copy of the CAFO in the above-entitled case and have an authorized representative of Dresser sign page 22 of the CAFO and return it to me at the address listed above. Please note that Dresser is ordered, pursuant to the terms of the CAFO, to pay a civil penalty in the amount of \$2,503 and to comply with the provisions of the RCRA Compliance Order Section. Additionally, Dresser has agreed to perform a Supplemental Environmental Project ("SEP") in the amount of \$35,500. The civil penalty is to be paid by cashier's check or certified check made payable to the Treasurer of the United States of America.

The EPA has incorporated the approved SEP terms and conditions proposed by Dresser into the CAFO. The EPA recognizes the benefit of providing certain explanatory language in the CAFO pertaining to the SEP, payment of civil penalty, and other issues related to this enforcement action. Once the necessary signatures are obtained, EPA will file the original CAFO with the Regional Hearing Clerk and provide a fully-executed copy to Dresser. Dresser will have thirty (30) days from the effective date of the CAFO (the effective date is the date upon which the CAFO is filed) to pay the civil penalty assessed.

Thank you for your assistance in this matter.

Sincerely,

Scott McDonald **Assistant Regional Counsel** 

Enclosure

LUTZ 6EN-HS

PETERS FOTTS
6EN-H

SYKES 6RC-EW **BENTON** 6RC-EW

BOYD 6RC-E

# CERTIFICATE OF SERVICE

I hereby certify that on this da	ay of, 2003, the original and one copy of
the foregoing fully executed Consent Ag	greement and Final Order were hand delivered to the
Regional Hearing Clerk, U.S. EPA - Reg	gion 6, 1445 Ross Avenue, Dallas, Texas 75202-2733,
and that true and correct copies were place	ced in the United States Mail, addressed to the
following:	
VIA CERTIFIED MAIL - RETURN RE	CEIPT REQUESTED
Peter M. Reynolds, Esq.	
Assistant General Counsel	
Dresser, Incorporated	
Addison, TX 75001	
Addison, 17. 75001	
Corporation Service Company	
Registered Agent	
320 Somerulos Street Baton Rouge, LA 70802-6129	
Baton Rouge, EA 70802-0129	
	Scott McDonald
	Assistant Regional Counsel
Cartified Datum Daggint N	
Certified Return Receipt No.	



Tuesday, November 11, 2003

Scott McDonald, Esq.
Assistant Regional Counsel
Environmental Protection Agency Region
Region 6
1445 Ross Avenue Suite 1200
Dallas, Texas 75202-2733

Dear Scott,

Attached are the completed Consent and Final Order (CAFO) that has been signed and a copy of the Official check, which was forwarded to the Pittsburgh address. If there are any changes please advise and advise of the final effective date so we can begin to prepare the SEP plan as per the Appendix A of the CAFO.

Sincerely,

Terry A. Turner

Copy: Peter Reynolds, Esq. Senior Counsel

J. R. Foster, Manager Manufacturing, Dresser

File Copy to SEP folder:

REGISTERED MAIL: RETURN RECEIPT REQUESTED ARTICLE NO. P081-642-804

#### Attached:

Copy Cashiers Official Check no. 07403 from the Colfax Banking Company Dated Nov. 5, 2003: Completed and signed CAFO – 22 pages:

H:\projects\hse\epa report to peter reynolds.doc





#### Flow Control

Tuesday, November 11, 2003

Attn: Carol Peters-Wagnon, Chief RCRA Enforcement Branch ALONM Section (6EN-HS) Compliance Assurance and Enforcement Division U. S. EPA – Region 6 1445 Ross Avenue Suite 1200 Dallas, Texas 75202-2733

RE: In the Matter of Dresser Inc. Docket No. RCRA-06-2003-0903:

Attached is a copy of the cashiers check (Official Check No. 07403) for the Consent and Final Order (CAFO) as referenced in the subject heading.

Terry A. Turner

Copy: Peter Reynolds, Esq. Senior Counsel J. R. Foster, Manager of Manufacturing

File copy to SEP folder

REGISTERED MAIL: RETURN RECEIPT REQUESTED ARTICLE NO. P081-642-807

Attached:

Copy Cashiers Official Check no. 07403 from the Colfax Banking Company Dated Nov. 5, 2003:

H:\projects\hse\epa report to peter reynolds.doc



# Colfax Banking Company

07403

84-163/1111

DATE \_\_November 5,2003

PAY TO THE ORDER OF Treasurer of the United States of America in the Matter of

2,503.00

Dresser, Inc. Dockett #RCRA-06-2003-0903

COLFAX BANKING 2,503 dol's 00 ctx

MEMBER FDIC

OFFICIAL CHECK

10074031

9 2060 151

## RCRA 3008(a) FINAL COMPLAINT CONCURRENCE/SIGNATURE ROUTING SLIP

FACILITY NAME:	DresserInc.					
ADDRESS:	U.S. Highway 167 and S Alexandria, LA	tate Highw	ay 3220			
EPA I.D. NO.:	LAD071940223					
DOCKET NO.:	RCRA-06-2003-0903					
ENF. OFFICER:	Craig Lutz					
ATTORNEY:	Scott McDonald					
CHECKLIST:		YES	NO	AVAI	LABLE	N/A
5. CERTIFICATE O 6. PENALTY CAL 7. PENALTY SPRI 8. PEER REVIEW I 9. BEN PRINTOUT 10. PERTINENT CA 11. RCRIS DATA	CATION LETTER OF SERVICE CULATIONS EADSHEET DOCUMENTATION	[X] [X] [X] [X] [X] [ ] [ ] [ ]		[	] ] ] ] ] ] ]	
CONCURREN	ICES	IN	ITIALS		Ε	DATE
Craig Lutz, Enforcement Officer (	6EN-HS)	CL			5/2	003
Scott McDonald, Attorney (6EN-1	LH)	50	1		5/2	1/03
Terry Sykes, Attorney Team Lead	er (6EN-LH)	AHE	s lea	NO	6/1	203
Carol D. Peters, Chief (6EN-HS)		g l	9	$\circ$	<u> </u>	13/03
Jeanette Morgan, Secretary (6EN-	·H)	VAN	1		6	16/03
Mark Potts, Chief (6EN-H)	fer	SG 7			6/	16/03
Samuel Coleman, Director (6EN)	Ţ	aw 6/17	Xi.	/	6	17/03
Scott McDonald, Attorney (6EN-1	LH)	40	<u>}                                    </u>		6/1	103
Craig Lutz, Enforcement Officer (	6EN-HS)		U			,
COMPLAINT FILED: Lauretta S	cott (6EN-HT)					
MARUN BENN W Boyd Wing Br	THIS FOLDER TO THE ENF NPCD (BRC-4m) Chief, Eng. (68	CE (	T OFFICE M B	ER AFTE.	r filing ( le	13/25 13/03

# 06-0039



#### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6 1445 ROSS AVENUE, SUITE 1200 DALLAS, TX 75202-2733

MAY 18 2004



Certified Mail: Return Receipt Requested -7001 0360 1267 0471

Mr. Terry Turner Plant Engineer Dresser Flow Control P.O. Box 1430 Alexandria, LA 71309

Re:

Consent Agreement And Final Order

Docket Number RCRA-06-2003-0903

Dear Mr. Turner:

We have reviewed your supplemental environmental project (SEP) implementation plan and scope of work, dated April 15, 2004 and find that it meets the requirements agreed upon under Consent Agreement and Final Order. By this letter, the Environmental Protection Agency (EPA) is providing written approval of the SEP implementation plan and scope of work as required by the terms of the consent agreement.

If you have any questions, please contact Mr. Craig Lutz, of my staff, at (214) 665-2190.

Sincerely,

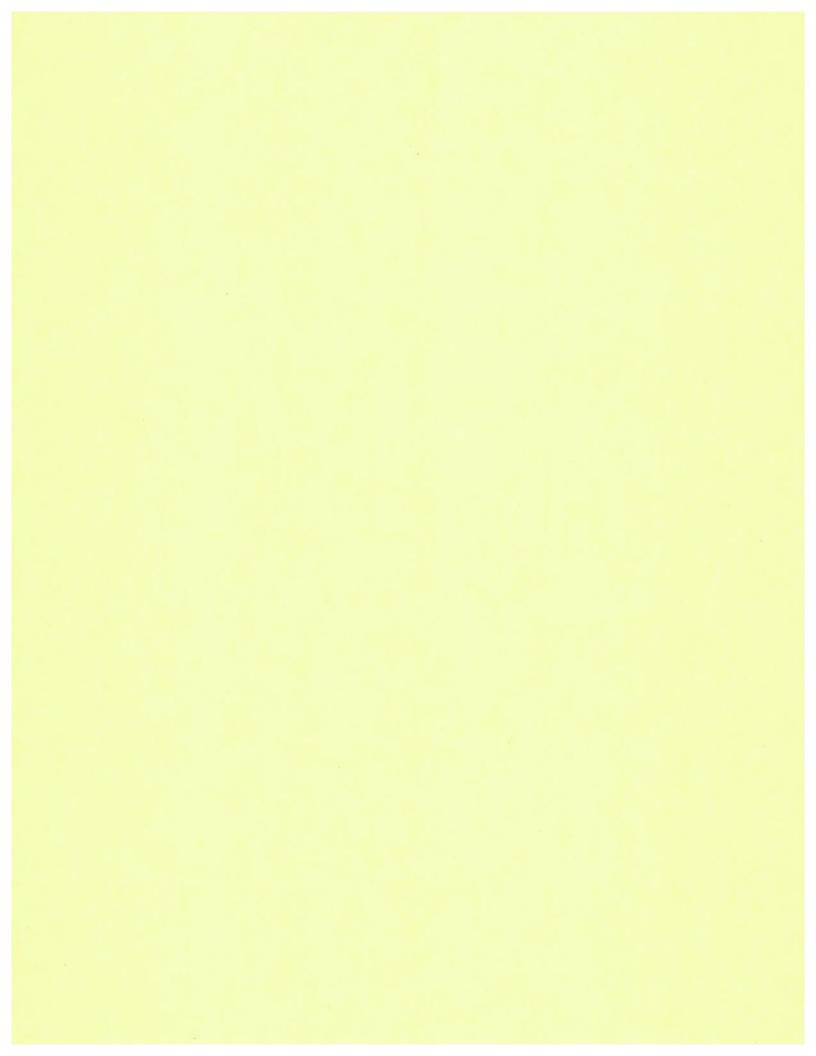
Carol Peters-Wagnon, Chief

Arkansas, Louisiana, Oklahoma

and New Mexico Section

Hazardous Waste Enforcement Branch

Cun Peter Warm



Craig Lutz

To: Scott McDonald/R6/USEPA/US@EPA

07/21/2003 02:58 PM

Subject: Dresser Inc. SEP Analysis

I have reviewed the three SEPs submitted by Dresser. Proposal 1 would seem to be ineligible for an SEP because it has been completed. The Facility did not provide any cost estimate for Proposal 3, therefore, it could not be evaluated.

Proposal 2 for eliminating the zinc phosphate line has a value of \$32,329 based on the information provided by Dresser. The current penalty calculation has the penalty at 10,010, all of which is a gravity component. The SEP policy stated that we must collect 25% of this amount. This means that we can mitigate \$7,507. Dresser would get credit for 23% of the project in Proposal 2. This is well within the 80% credit allowed by the SEP Policy.

Craig Lutz (214) 665-2190

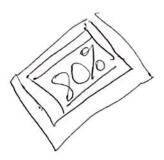
Three (3) Supplement Environmental Projects – that possibly could be developed as possible candidates reviewed with EPA and Dresser Management are listed below if there is a type of submission process or form, We would entertain the submission as we have always worked at compliance and exceeding the requirements.

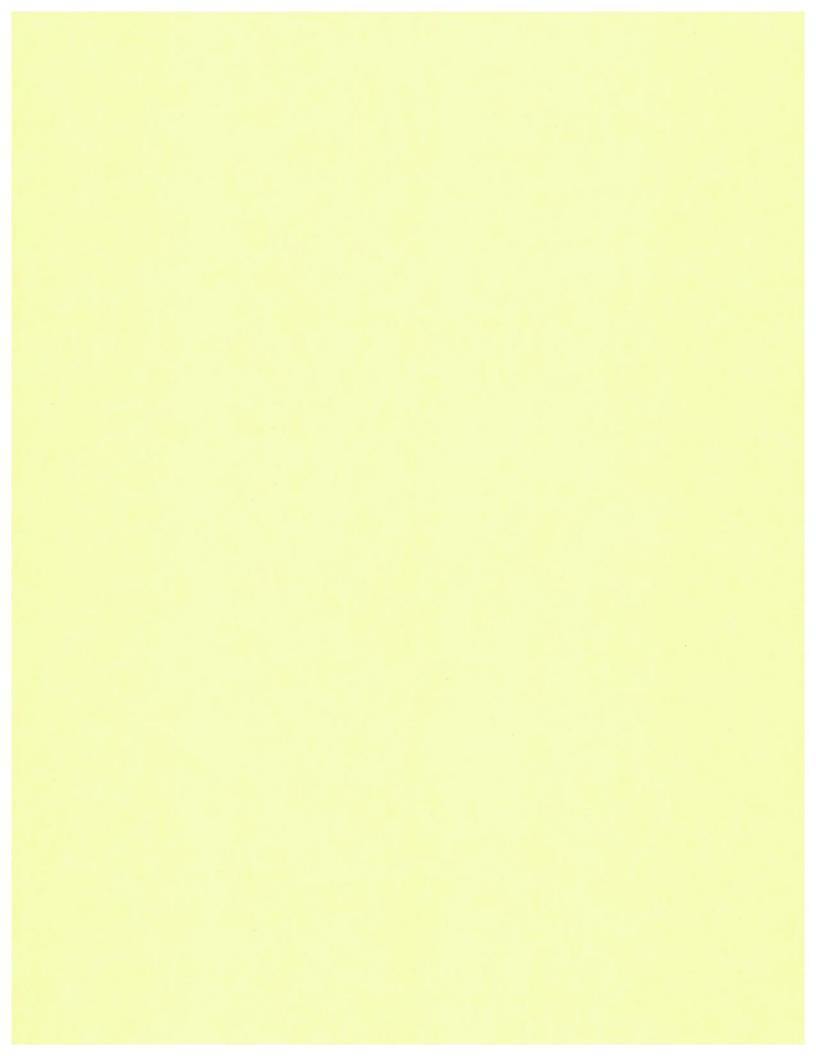
- Pollution Prevention Project:
   Elimination of the lead seals, paints, and any other lead containing products from our valve line:
- b. Emergency Planning and Preparedness Project:

Set up with the (LFD) – Alpine Volunteer Fire Department an Emergency deluge system for the control of butane or highly flammable materials at the Dresser Valve plant in two (2) covered storage areas external to the plant.

Hazungper Training

- c. Pollution Prevention Project:
  - Eliminate the zinc phosphate coating system that generates the hazardous waste corrosive liquids that are in storage and 50% of the hazardous waste generated at this facility.







Monday, July 14, 2003

Environmental Protection Agency Region VI 1445 Ross Avenue Suite 1200 Dallas, Texas 75202-2733

Attn. Craig Lutz

day (214) 665-72 64

Dear Mr. Lutz,

On behalf of Dresser, we appreciate the opportunity to meet with you last week. Pursuant to your request are summaries of the three (3), proposed Supplemental Environmental Projects (SEP's) for your review. For each project, a schedule allowing for completed project, manufacturing engineering review, product-engineering review's to finalize the project, and then complete a budget/capital request for funding, will be needed.

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This training will be held in conjunction with our Emergency Response Team training and will familiarize the AVFD personnel with our facility and the needs to reduce environmental exposure as much as possible with out sacrifice to human life needs first.

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A review of the MODEL SEP CAFO was found at the site address Scott McDonald had supplied and we are going in this direction, as we would like to continue to work with you to address this matter through a consent order.

Since these are in the draft format also don't mind advising of any area not addressed. We would be pleased to provide more detail as needed.

Terry A Turner

Copy:

Curt Hensley

Ralph Foster

Peter Reynolds

Scott McDonald

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.318+040+0344

Supplemental Environmental Plan (SEP)- Proposal #1 - Elimination of lead seals from valve production:

Project Implementation- after the June 14, 2001 EPA inspection and the Dec. 2002 informational request booklet supplied to EPA, a decision was made to eliminate the lead seals from a long standing way of sealing completed valves after test. The process was changed to aluminum seals, which are environmentally friendly and can withstand the high temperatures and environment our valves are subjected to. This project removed 9,850 lbs. of lead from our process.

1. Explain how the proposed SEP will improve, protect, or reduce risk to public health or the environment.

The elimination of lead seals benefits (protects) the environment from another source of lead that could end up in trash piles at Dresser Flow Control, storm water or cooling water and lakes, at our facility and facilities around the world.

2. Explain the relationship between the alleged violations and the proposed project.

This project has eliminated the D008 hazardous waste stream and a toxic material environmentally, and maintains the integrity of the plant trash incineration system as a non-hazardous incinerator for the intended reduction of plant trash by a 100:1 ratio and is not a health concern to our employees.

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- b. No capital cost required:
- c. Operational cost Aluminum seals, grippers (Pliers with stamps) had to be changed out, and ergonomically reviewed, as the pressure to trademark aluminum was more, and required a new trademark as the space and pressure applied to trademark stamp, were changed when we moved from lead to aluminum seals.
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(Legal, engineering, and trademark application process)	
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and implement engineering drawings changes 35 hours of time X 75	2,625
4. Purchasing set up new vendor, part no. and purchase orders: 15 hours X 65	975
5. Plant engineering to set up removal, ship to customers 24,000 lead seal to Saudi Ara	abia
and remove all lead from valve sealing areas and set up new containers for Alumini	
20 hours of time X 65	\$1300
6. 25 new crimping tools	\$5,000
7. Now updating all environmental forms for State and EPA by plant engineering	
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"Source reduction" The elimination of lead seals as a part of the valve manufacturing process has eliminated a toxic material at the point of generation, and protects natural resources with the elimination of approximately 9,850 lbs. of lead that is annually released to the environment.

#### Time line:

This was implemented in April 2003 due to effort and continual push by management to make this happen as a major project among many other daily manufacturing and product demands to keep the operations going.

The formulation of this project into a formal SEP with drawings, time lines, definitions, and project audits to complete the EPA Supplemental Environmental Projects Policy would take approx. 3 months: Estimated Oct. 2003 end of month completion of all documentation and submittal:

#### Summary:

We are requesting consideration for this project as a SEP due to the positive impact it will have on the elimination of lead both here at the Dresser Flow Control Alexandria, Louisiana plant and around the world for our customers.

Supplemental Environmental Plan (SEP)- Proposal #2 – Zinc Phosphating process change: (SEP for Dresser Flow Control, Alex. La Plant Only)

Project Proposal --- To change out the existing zinc phosphate process, (which generates the D002 hazardous waste acid water and the hazardous waste alkaline water solutions – highly corrosive): Proposal is to change to a "Birchwood Casey" Tru-temp 190 deg. F black oxide coating which is environmentally friendly and generates no hazardous waste, and to also make this a closed loop system.

1. Explain how the proposed SEP will improve, protect, or reduce risk to public health or the environment.

The reduction of all hazardous waste generation from this process would be eliminated; the capture of hazardous waste D002, and the accumulation, and disposal of this D002 waste stream would be eliminated:

Elimination of worker handling and transportation of this hazardous waste on US highways would be an environmental benefit.

2. Explain the relationship between the alleged violations and the proposed project

The 55-gallon drums that were the subject of the compliance order would be eliminated, as there would be no hazardous waste generated from the proposed process.

3. Provide details of project:

7-18-03;11:06AM; DHESSER IVO F. E.

This is where we are currently working on the cost, product acceptance "Black Oxide" as an acceptable replacement of zinc phosphating, working through product engineering, manufacturing engineering, and a hazard communications review of MSDS sheets, prior to any project definition finalization. We expect this evaluation to take approximately 12 weeks.

Initial plan of what is proposed for the "Birchwood Casey" product.

a. Requires adding two (2) additional dip tanks, and elementary pH neutralization system (s) and revamp of the existing dipping process, times, chemicals and steps. We can integrate four of the existing dip tanks into the process.

b.	"Ball Park cost" That would require capital expenditure.	
	Added tanks (2)	2800 /ea. X2
	Elementary pH neutralization system	3800/ea X2
	Revamp of existing line to incorporate the added tanks	4800/ea
	Electrical changes and addition of pH controls	2800/ea
	Modification of existing spill containment pan	3200/ea
	Initial chemicals charge (set up)	3800/ea
	Planning, engineering, management (90)	7700/ea
	Project projected total	\$35,500

c. Annual operational cost estimated, operator, maintenance, and chemicals:

Annua	I projected total	\$21,500
Aimua	i projected total	<b>4</b> 1

d. Annual savings in hazardous waste disposal cost reduction:

Annual projected \$18,500

4. Identify the categories from the EPA SEP Projects policy that your proposed project can qualify as a SEP under.

Category 2: Pollution Prevention - From SEP project definition categories:

"Source reduction" The proposed project would reduce generation of highly corrosive hazardous waste acids, hazardous waste alkaline at point of generation.

Time lines and progress to date:

Product engineering/applications engineering has reviewed written literature on the "black oxide" process and have had one meeting with the "Birchwood Casey" sales rep and is requesting a formal recommendation and cost estimate of the products. We have gotten MSDS sheets on all but the equal for the tank #3 etching acid equal.

Internal hazard communications and safety committee personnel are reviewing MSDS sheets before recommending approval to proceed.

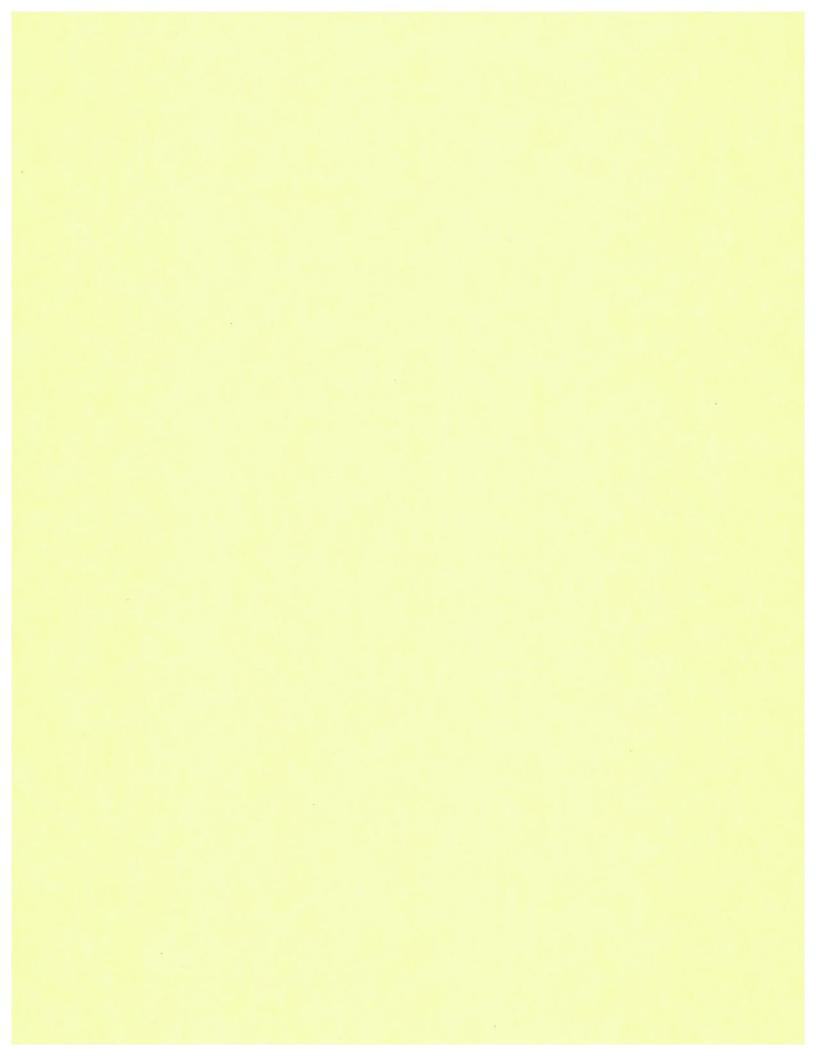
These two (2) above items should be completed in September 2003:

Then product engineering will set up and ship out valve parts for a "trail test" and then subject to an industry wide recognized "salt spray test":

If these results are approved then a project definition and production process change will be forwarded to manufacturing engineering to review cost and standards for changing to this process:

These two (2) items should be completed by Jan. 2004:

The whole project process change and implementation could possibly be completed by May 2004 if all above approved and "black oxide" coating proves to be a viable alternative to zinc phosphating:





# **FAX TRANSMITTAL**

Date: July 15, 2003

To:

Scott McDonald, Esq.

Fax:

214/665-3177

Ref:

Alexandria Complaint

No. Pages including cover page:

CC:

The information contained in and transmitted with this facsimile is subject to: (1) attorney-client privilege; (2) attorney work product privilege, or (3) is confidential. It is intended only for the individual or entity designated above. If you are not the intended recipient, you are hereby notified that any unauthorized disclosure, dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error, please notify us immediately by telephone, and return the original message to us at the above address via the postal service. Thank you.



Peter M. Reynolds Assistant General Counsel

July 15, 2003

Scott McDonald, Esq.
United States Environmental Protection Agency
1445 Ross Avenue, Suite 12300
Dallas, Texas 75202-2733

Re: Complaint, Compliance Order and Notice or Opportunity for Hearing Docket No. RCRA-06-2003-0903

Dear Mr. McDonald:

This is further to today's conversation and is to confirm that we, Dresser, Inc., have received, reviewed and understood the contents of the referenced complaint, compliance order and notice of opportunity for hearing. And we have had the chance in a prior conference call with EPA and EPA's counsel to discuss the substance and procedure for developing SEP's as a method to work to resolution of this matter.

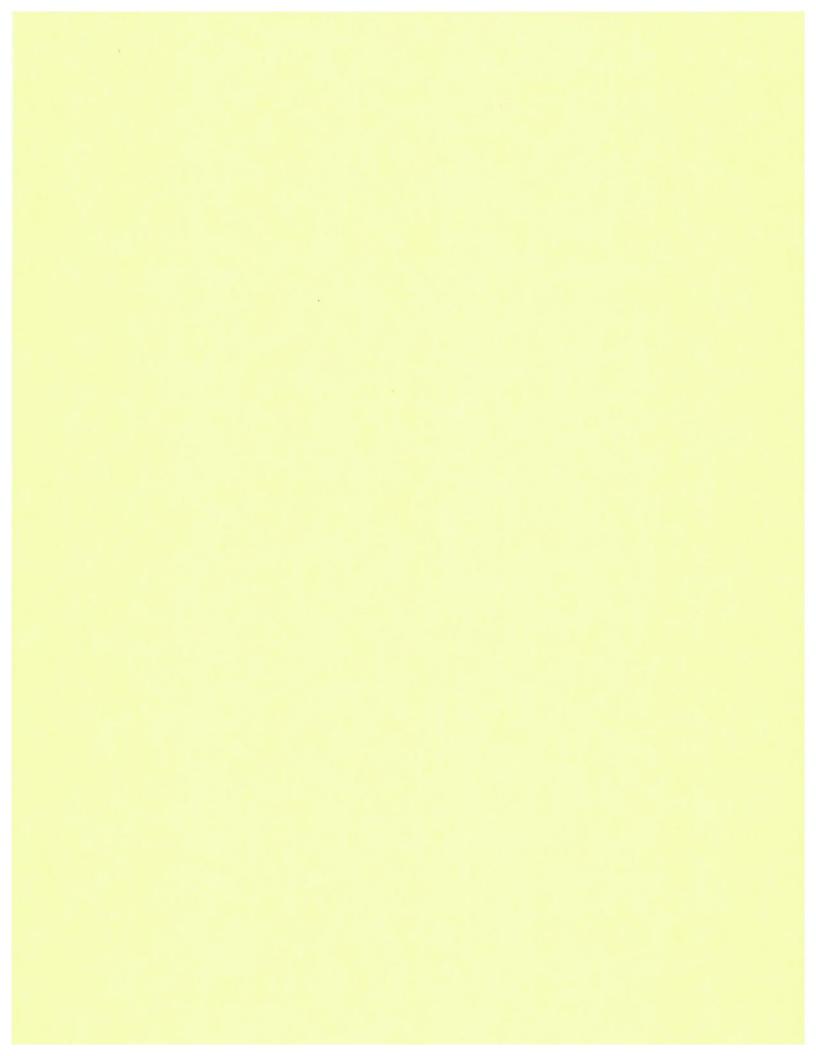
We anticipate providing the SEP information to you this month.

If you require any further information from us, please call to discuss. Thank you.

Sincerely,

Peter M. Reynolds

Assistant General Counsel





Scott McDonald

To: Craig Lutz/R6/USEPA/US@EPA

07/09/2003 11:45 AM

Subject: RE: Dresser Call on Thursday (7/10)

#### ---- Forwarded by Scott McDonald/R6/USEPA/US on 07/09/2003 11:44 AM -----



"Hensley, Curtis J" <Curtis.Hensley@cons olidatedvalve.com> 07/09/2003 08:04 AM

To: Scott McDonald/R6/USEPA/US@EPA, "Reynolds, Peter" <Peter.Reynolds@Dresser.com>

cc: "Turner, Terry A" <Terry.Turner@consolidatedvalve.com>, "Foster, Ralph J" <Ralph.Foster@consolidatedvalve.com>

Subject: RE: Dresser Call on Thursday (7/10)

Scott and Peter,

Alexandria will call 214-665-2177 at 10:00 am (central time) on Thursday July 10, 2003. In case of problem we will be at 318-640-6474. Present in Alexandria will be Ralph Foster (Manufacturing Engineering Manager), Terry Turner (Maintenance Manager), and Curtis Hensley(Director of Operations)

Thanks

Curt

----Original Message----

From: Reynolds, Peter

Sent: Tuesday, July 08, 2003 4:17 PM

To: Hensley, Curtis J

Subject: FW: Dresser Call on Thursday (7/10)

If you will call in directly, please let Scott McDonald/me know. Thanks.

----Original Message----

From: Mcdonald.Scott@epamail.epa.gov [mailto:Mcdonald.Scott@epamail.epa.gov]

Sent: Tuesday, July 08, 2003 10:48 AM

To: peter.reynolds@dresser.com

Subject: Dresser Call on Thursday (7/10)

Mr. Reynolds -

It appears that we can accommodate two incoming calls (read attached)...Will that work? The call-in number is also provided below. Thanks - Scott 214/665-2718

---- Forwarded by Scott McDonald/R6/USEPA/US on 07/08/2003 10:45 AM

Craig Lutz

To:

Scott

McDonald/R6/USEPA/US@EPA

07/08/2003 08:09

cc:

AM

Subject: Dresser Call on

Thursday (7/10)

400

I forgot to add that the number for the Brown Pelican room is (214) 665-2177.

Craig Lutz (214) 665-2190

---- Forwarded by Craig Lutz/R6/USEPA/US on 07/08/2003 08:08 AM ----

Craig Lutz

AM

To: Scott

McDonald/R6/USEPA/US@EPA

07/08/2003 08:07

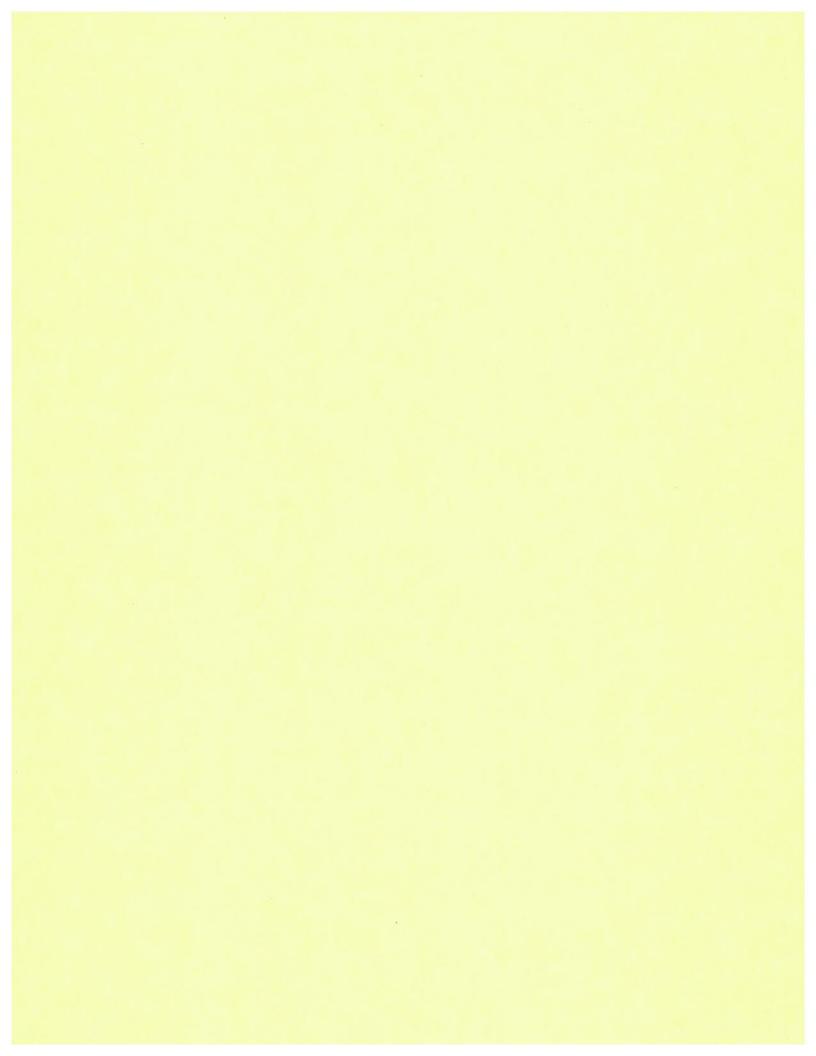
cc:

Subject: Dresser Call on

Thursday (7/10)

I have the Brown Pelican room reserved from 10-12 on Thursday, July 10th. We only have the ability to connect to two parties. The teleconferencing lines here in the Region and in Headquarters are booked up during this time so they will either have to get everyone on the line and call us, limit the number of lines that we have to hook up to 2, or have the call at a different time. The lines are available for any other time except 10 to 12.

Craig Lutz (214) 665-2190





# UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6 1445 ROSS AVENUE, SUITE 1200 DALLAS, TX 75202-2733

# JUN 16 2003

# CERTIFIED MAIL - 7001 0360 0001 1267 0549 - RETURN RECEIPT REQUESTED

Corporation Service Company 320 Somerulos St. Baton Rouge, LA 70802-6129

1

Re:

Resource Conversation and Recovery Act (RCRA) Complaint and Notice of Opportunity for Hearing EPA Docket Number RCRA-06-2003-0903

Dear Sir:

Enclosed is a document entitled "Complaint, Compliance Order, and Notice of Opportunity for Hearing" (Complaint) filed by the U.S. Environmental Protection Agency ("EPA") Dresser, Inc. ("Dresser"), located at the intersection of U.S. Highway 167 and State Highway 3220 in Alexandria, Louisiana, pursuant to Section 3008(a) of the Resource Conservation and Recovery Act ("RCRA"), as amended, 42 U.S.C. § 6928(a). EPA alleges in the Complaint that Dresser failed to comply with the above-cited statutes and the regulations promulgated thereunder. These violations are specifically set forth in the Complaint. Please also find enclosed an "Information Sheet" relating to the Small Business Regulatory Enforcement Fairness Act (SBREFA) and a "Notice of Registrants Duty to Disclose" relating to disclosure of environmental legal proceedings to the Securities and Exchange Commission (SEC).

By law, you have a right to request a hearing regarding the violations alleged in the Complaint and the proposal to assess an administrative civil penalty. Please pay particular attention to the Complaint Section entitled "Opportunity to Request a Hearing". Note that should you fail to respond to the allegations and request a hearing within thirty (30) days of your receipt of the Complaint, you will waive your right to such a hearing, and the proposed civil penalty may be assessed against you through default proceedings. You have the right to be represented by an attorney or to represent yourself at any stage of these proceedings.

Whether or not you request a hearing, we invite you to confer informally with the EPA concerning the alleged violations and the amount of the proposed penalty. EPA encourages all parties against whom it takes an action to pursue the possibility of settlement as a result of an informal conference. Any settlement would be formalized by the issuance of a Consent Agreement and Final Order signed on behalf of all parties. Its issuance would constitute a waiver of the right to a hearing or appeal of any issue raised in the Complaint.

A request for an informal conference does not extend the time by which you must request A request for an informal conference does not extend the time by which you a hearing on the proposed penalty assessment; the two procedures can be pursued simultaneously. If you have any questions, or wish to discuss the possibility of a settlement of this matter, please contact Mr. Scott McDonald, Enforcement Counsel, Water/RCRA Enforcement Branch at (214) 665-2718. Any response to the Complaint or request for a hearing should be addressed to the Regional Hearing Clerk (6RC), U.S. EPA Region 6, 1445 Ross

We urge your prompt attention to this matter.

Sincerely yours,

Samuel Coleman, P.E.

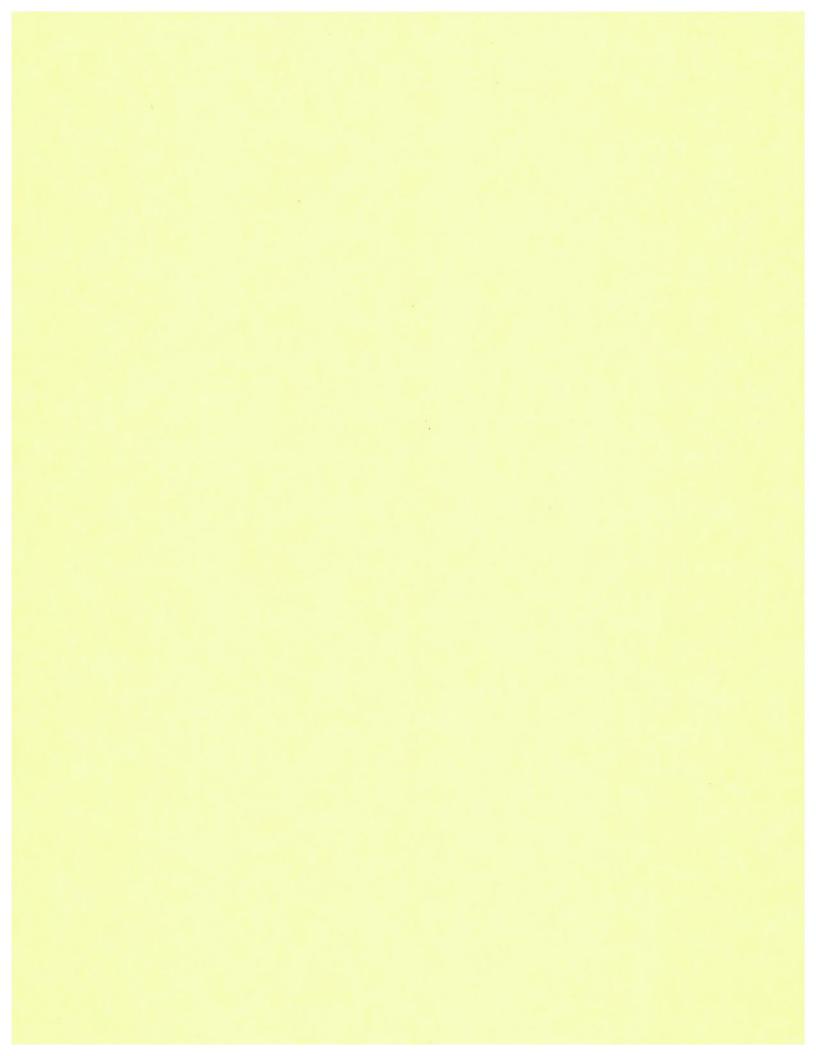
Director

Compliance Assurance and Enforcement Division

# enclosures

Mr. Terry Turner, Plant Engineer cc: Dresser Measurement Division, Dresser, Inc.

Peggy Hatch, Administrator Enforcement Division Louisiana Department of Environmental Quality



# UNITED STATES ENVIRONMENTAL PROTECTION AGENCY 18 TO 3: 17 REGION 6 DALLAS, TEXAS

IN THE MATTER OF:	§	
	§	
Dresser, Inc.	§	
<b>Dresser Measurement Division</b>	§	
Alexandria, Louisiana	§	
	§	DOCKET NO.
EPA I.D. NO. LAD071940223	§	RCRA-06-2003-0903
	§	
RESPONDENT	§	
	§	

# COMPLAINT, COMPLIANCE ORDER, AND NOTICE OF OPPORTUNITY FOR HEARING

The Complainant, Director of the Compliance Assurance and Enforcement Division of the United States Environmental Protection Agency (EPA), issues this COMPLAINT, COMPLIANCE ORDER, AND NOTICE OF OPPORTUNITY FOR HEARING (Complaint) to Dresser, Inc. (Respondent).

I.

## STATEMENT OF AUTHORITY

This Complaint is issued pursuant to Section 3008(a) of the Resource Conservation and Recovery Act of 1976 (RCRA), 42 U.S.C. § 6928(a), as amended by the Hazardous and Solid Waste Amendments of 1984 (HSWA). Section 3008(a) of RCRA authorizes the Administrator of the EPA to issue a complaint whenever the Administrator has information that any person has violated or is violating any requirement of Subtitle C of RCRA, 42 U.S.C. §§ 6921-6939e.

The requirements of Subtitle C include the requirements of the authorized program in a State which has been authorized to carry out a hazardous waste program under Section 3006 of RCRA, 42 U.S.C. § 6926. On February 7, 1985, EPA granted the State of Louisiana the authority to administer a hazardous waste management program, and there have been subsequent authorized revisions to said program. With the addition of Section 3006(g) of RCRA, 42 U.S.C. § 6926(g), new requirements imposed pursuant to the authority of HSWA are immediately applicable in the authorized states upon the federal effective date. The Louisiana Department of Environmental Quality (LDEQ) is the designated State Agency responsible for carrying out the authorized RCRA program in Louisiana.

The authority to issue such Complaints has been delegated by the Administrator of the EPA to the Regional Administrator, EPA Region 6, and has been further delegated to the Compliance Assurance and Enforcement Division Director, EPA Region 6.

The Complainant in this action is the Director, Compliance Assurance and Enforcement Division, EPA Region 6, who is the person to whom authority has been delegated to issue such Complaints in the States of Arkansas, Louisiana, Oklahoma, New Mexico, and Texas.

Π.

#### **NOTICE TO THE STATE**

Notice of this action has been given to the State of Louisiana prior to the issuance of this Complaint, pursuant to Section 3008(a)(2) of RCRA, 42 U.S.C. § 6928(a)(2).

#### ALLEGATIONS

- Dresser, Inc. (Respondent) is a corporation incorporated under the laws of the State of
   Delaware in April 1958, and qualified to conduct business in the State of Louisiana.
- 2. Respondent began doing business in the State of Louisiana in 1958.
- 3. Respondent is a "person" as that term is defined in Louisiana Administrative Code (LAC) 33:V.109, Section 1004(15) of RCRA, 42 U.S.C. § 6903(15), and 40 Code of Federal Regulations (C.F.R.) § 260.10.
- Respondent's Registered Agent for service is Corporation Service Company, 320
   Somerulos Street, Baton Rouge, Louisiana 70802-6129.
- 5. Respondent owns and operates a business that manufactures relief valves and safety valves, involving processes which include machining, welding, metal finishing, coating, assembly, and packaging. The business is located at the intersection of U.S. Highway 167 North and State Highway 3220 in Alexandria, Louisiana (Facility).
- 6. Pursuant to Section 3010(a) of RCRA, 42 U.S.C. § 6930(a), on or about August 8, 1980, Respondent filed a Notification of Registration (NOR) with the LDEQ as a Large Quantity Generator of Hazardous Waste. The Respondent's Facility was assigned the EPA Identification Number LAD071940233.
- 7. For purposes of this Complaint, the term "Hazardous Waste" shall mean "Hazardous Waste" as defined at LAC 33:V.109 [40 C.F.R. § 261.3].
- 8. The Respondent's Facility is a "facility" as that term is defined at LAC 33:V.109 [40 C.F.R. § 260.10].

9. Pursuant to Section 3007(a) of RCRA, 42 U.S.C. § 6927(a), on June 14, 2001, EPA representatives conducted a Compliance Evaluation Inspection (Inspection) at Respondent's Facility.

IV.

#### RCRA VIOLATIONS

COUNT I - HAZARDOUS WASTE STORAGE AREA:

OPERATING A HAZARDOUS WASTE STORAGE FACILITY WITHOUT INTERIM

STATUS OR PERMIT IN VIOLATION OF 40 C.F.R. §§ 270.1 AND 270.10, AND RCRA

SECTION 3005(a), BY FAILING TO MEET THE EXEMPTION REQUIREMENTS OF

LAC 33:V Subpart 1 [40 C.F.R. § 262.34]

- 10. Paragraphs 1 through 9 are realleged and incorporated by reference.
- 11. Pursuant to LAC 33:V Subpart 1 [40 CFR §§ 270.1 and 270.10] and RCRA Section 3005, the storage of hazardous waste is prohibited without a permit or interim status.
- 12. During the Inspection, EPA representatives observed, documented, and photographed four (4) drums of material situated in the Facility's designated hazardous waste storage area with accumulation start-dates marked as January 2, 2001. These drums had remained on-site in excess of the allowed ninety (90) day storage period.
- 13. Pursuant to LAC:V.1109.E.2 [40 C.F.R. § 262.34(a)] generators of hazardous waste are allowed to store waste on-site for ninety days without a permit or interim status, in accordance with LAC 33:V Subpart 1 [40 C.F.R. §§ 270.1 and 270.10]. A generator who accumulates hazardous waste on-site for more than ninety (90) days is considered an operator of a hazardous waste storage facility and is subject to the requirements of 40 C.F.R. parts 264 and 265 and the permit requirements of 40 C.F.R. part 270, unless the generator has been granted an extension to the 90-day period.

14. Therefore, based on the above, Respondent violated LAC 33:V Subpart 1 [40 C.F.R. §§ 270.1 and 270.10] and RCRA Section 3005 by storing hazardous waste for longer than ninety (90) days without a permit or interim status.

# COUNT II - SATELLITE ACCUMULATION CONTAINER: OPERATING A HAZARDOUS WASTE STORAGE FACILITY WITHOUT INTERIM STATUS OR PERMIT IN VIOLATION OF 40 C.F.R. §§ 270.1 AND 270.10, AND RCRA SECTION 3005(a), BY FAILING TO MEET THE EXEMPTION REQUIREMENTS OF LAC 33:V Subpart 1 [40 C.F.R. § 262.34]

- 15. Paragraphs 1 through 14 are realleged and incorporated by reference.
- During the Inspection, EPA representatives observed, documented, and photographed a satellite container accumulating used sandblasting materials. Facility personnel stated to the EPA representatives at the time of the inspection that the Facility classified said sandblasting waste as a D008 hazardous waste which exhibits the characteristic of toxicity for lead, as defined at LAC:V.4903.E.2 [40 C.F.R. § 261.24]. Respondent failed to properly label and identify the contents of said container.
- 17. Pursuant to LAC:V.1109.E.4 [40 C.F.R. § 262.34(c)] a generator is allowed to accumulate as much as fifty-five (55) gallons of hazardous waste in containers at or near the point of generation without a permit or interim status, provided that the generator clearly marks the containers with the words "Hazardous Waste" or other words that identify the contents of the container. Respondent does not have a RCRA permit, nor is the Facility operating under interim status.
- 18. Therefore, based on the above, Respondent violated LAC:V.1109.E.4 [40 C.F.R. § 262.34(c)] by failing to mark the container accumulating used sandblasting material with the words "Hazardous Waste" or other words that identify the contents. Thus, Respondent failed to

meet the exemption requirements of 40 C.F.R. § 262.34, and stored hazardous waste without a permit or interim status in violation of 40 C.F.R. §§ 270.1 and 270.10, RCRA Section 3005(a), and LAC 33:V Subpart 1.

# COUNT III - FAILURE TO MAKE A HAZARDOUS WASTE DETERMINATION AS REQUIRED BY LAC 33:V.1103 [40 C.F.R. § 262.11]

- 19. Paragraphs 1 through 18 are realleged and incorporated by reference.
- 20. During the Inspection, representatives of the Facility stated that a lacquer thinner (Sherwin-Williams Sol-Lac RK120) was used as a solvent for cleaning paint guns at the Facility. Facility personnel stated to EPA representatives that the Facility classified the waste generated by the paint gun cleaning process as a D001 hazardous waste which exhibits the characteristic of ignitability, as regulated by LAC:V.4903.B [40 C.F.R. § 261.21]. A review of the Material Safety Data Sheet (MSDS) shows that said lacquer thinner contains thirteen percent (13%) toluene by weight which is twelve percent (12%) toluene by volume.
- 21. Pursuant to LAC:V.4901.B.1 [40 C.F.R. § 261.31] spent toluene, a non-halogenated solvent, contains ten percent (10%) or more toluene by volume (before use) and is thereby listed as a hazardous waste with the EPA (Hazardous Waste No. F005).
- 22. Pursuant to LAC:V.1103.B [40 C.F.R. § 262.11(b)] a person who generates a solid waste must first determine if that waste is a listed hazardous waste, in accordance with LAC:V Chapter 49 [40 C.F.R. § 261, Subpart D].
- 23. Therefore, based on the above, Respondent violated LAC:V.1103 [40 C.F.R. § 262.11] by failing to first determine that the solid waste was a listed hazardous waste generated from the paint gun cleaning process, as set forth under LAC:V Chapter 49 [40 C.F.R. § 261, Subpart D].

# COUNT IV - FAILURE TO COMPLY WITH USED OIL STORAGE REQUIREMENTS BY ACCUMULATING USED OIL IN VIOLATION OF LAC: V.4301 [40 C.F.R. § 279.22]

- 24. Paragraphs 1 through 23 are realleged and incorporated by reference.
- 25. Pursuant to 40 CFR § 279.22, which is adopted by reference in LAC:V.4301, "containers and above ground tanks used to store used oil at generator facilities must be in good condition (no severe rusting, apparent structural defects or deterioration); not leaking (no visible leaks); and must be labeled or clearly marked with the words "Used Oil."
- 26. During the Inspection, EPA representatives observed, documented, and photographed five (5) tanks labeled as "Waste Oil". Facility personnel stated that the material stored in the tanks was wastewater containing an alkaline based cleaner and a paraffinic machine cutting oil. The Respondent further stated that the material was collected and sent to a fuel-blending facility.
- 27. The material stored in the tanks labeled "Waste Oil" is a used oil, as defined by LAC:V.4001 [40 C.F.R. § 279.1]. Used oil is any oil which has been refined from crude oil and subsequently used. As a result of such use, used oil is contaminated by physical or chemical impurities.
- 28. Respondent stored machine cutting oil and cleaner with wastewater in said tanks. The combined mixture of these constituents constitutes a material which meets the definition of used oil.
- 29. Generators are a required by LAC:V.4301.C.1 [40 C.F.R. § 279.22(c)] to label containers and tanks containing used oil with the words "Used Oil".
- 30. Respondent violated LAC:V.4301.C.1 [40 C.F.R. § 279.22(c)] by failing to label the

tanks containing used oil with the words "Used Oil".

31. Therefore, based on the above, Respondent violated LAC:V.4301 [40 C.F.R. § 279.22], by failing to comply with used oil storage requirements.

V.

#### RCRA COMPLIANCE ORDER

Pursuant to Section 3008(a) of RCRA, 42 U.S.C. § 6928(a), the Respondent is hereby **ORDERED** to take the following actions and provide evidence of compliance within the time period specified below:

- A. Respondent shall immediately cease unauthorized storage of hazardous waste and transport off-site any hazardous waste stored on-site in excess of ninety (90) days. Respondent shall provide documentation to EPA and LDEQ demonstrating that all hazardous waste accumulated on-site without a permit or without having interim status remains on-site for no more than ninety (90) days, pursuant to LAC:V.1109.E.2 [40 C.F.R. § 262.34(a)], and 40 C.F.R. parts 264, 265, and 270.
- B. Respondent shall immediately label or mark each container accumulating hazardous waste at or near the point of generation with the words "Hazardous Waste" or other words to identify the contents, pursuant to LAC:V.1109.E.4 [40 C.F.R. § 262.34(c)].
- C. Respondent shall immediately label and clearly mark each container and/or tank used for the storage of used oil with the words "Used Oil", pursuant to LAC:V.4301.C.1 [40 C.F.R. § 279.22(c)].
  - D. If Respondent fails to comply with the actions ordered in paragraphs A through C

(above) upon receipt of this Complaint, then Respondent shall immediately cease storage of all hazardous waste at the Facility until a hazardous waste permit has been applied for, approved, and obtained by Respondent in accordance with the requirements of 40 C.F.R. parts 264 and 265, and the permit requirements set forth in part 270.

- E. Within thirty (30) days of the effective date of this Complaint, Respondent shall submit to EPA a written certification that the actions ordered in paragraphs A through C (above) have been completely satisfied.
- F. Within sixty (60) days of the effective date of this Complaint, Respondent shall provide to EPA an itemized expense sheet listing costs incurred by Respondent in association with compliance of the requirements set forth in paragraphs A through C (above), including quantity and disposal costs for removal of the waste located in the Facility's hazardous waste storage areas.
- G. In all instances in which the RCRA Compliance Order section of this Complaint requires written submissions to EPA, each submission must be accompanied by the following certification signed by a "responsible official":

"I certify that the information contained in or accompanying this submission is true, accurate and complete. As to those identified portions of this submission for which I cannot personally verify the truth and accuracy, I certify as the company official having supervisory responsibility for the person(s) who, acting upon my direct instructions, made the verification, that this information is true, accurate, and complete."

For the purpose of this certification, a "responsible official" of a Respondent means a president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar decision-making functions for the corporation.

Unless otherwise requested, copies of all documentation required by this Order shall be sent to the following persons:

Carol Peters-Wagnon, Chief RCRA Enforcement Branch ALONM Section (6EN-HS) U.S. EPA, Region 6 1445 Ross Avenue, Suite 1200 Dallas, TX 75202-2733

Peggy Hatch, Administrator Enforcement Division Louisiana Department of Environmental Quality Office of Environmental Compliance P.O. Box 82215 Baton Rouge, LA 70884-2215

NOTICE: If you fail to take the required action(s) within the time specified in the Order, you may be liable for an additional penalty of up to TWENTY-SEVEN THOUSAND FIVE HUNDRED DOLLARS (\$27,500) for each day of continued noncompliance, and may be subject to further enforcement action, including injunction from any further generation, transportation, treatment, storage, or disposal of hazardous waste and such other and further relief as may be necessary to achieve compliance with Subtitle C of RCRA, all pursuant to Section 3008(c) of RCRA, 42 U.S.C. § 6928(c).

Notwithstanding any other provision of this Complaint, an enforcement action may be brought against the Respondent pursuant to Section 7003 of RCRA, 42 U.S.C. § 6973, or other statutory authority if the EPA finds that the handling, storage, treatment, transportation or

disposal of solid waste or hazardous waste at the Facility presents an imminent and substantial endangerment to human health or the environment.

#### VI.

#### PROPOSED CIVIL PENALTY

Section 3008 of RCRA authorizes a civil penalty of up to TWENTY-SEVEN
THOUSAND FIVE HUNDRED DOLLARS (\$27,500) per day for each violation of RCRA and the regulations promulgated thereunder. The Complainant proposes to assess a civil penalty of TEN THOUSAND AND TEN (\$10,010.00) against Respondent for the violations cited under 3008(a) of RCRA. The computation of the RCRA penalty amount is based upon the seriousness of the violations, the threat of harm to public health or the environment, any good faith efforts by Respondent to comply with the applicable regulations, and the October 1990 RCRA Civil Penalty Policy.

The RCRA penalties were calculated as follows:

Count I: Storing hazardous waste for longer than ninety days without a permit or interim status, as required by LAC 33:V Subpart 1 [40 C.F.R. §§ 270.1 and 270.10]

- 1. Gravity-based penalty from matrix \$330
  - a. Potential for harm Minor
     b. Extent of deviation Minor
- 2. Multi-day penalty from matrix \$110

Number of days of violation minus 1 for which a penalty is proposed - 72

The number of days in violation is the storage time, 163 days, minus 90 days, the time allowed for storage without requiring a permit.

Total & Proposed Penalty for Count I:

\$8,250

Count II: Failing to mark a satellite accumulation container with the words "Hazardous Waste" or other words that identify the contents, as required by LAC:V.1109.E [40 C.F.R. § 262.34]

1. Gravity-based penalty from matrix -

\$330

a. Potential for harm

Minor

b. Extent of deviation

Minor

Number of days of violation for which a penalty is proposed - (0)

Total & Proposed Penalty for Count II:

\$330

Count III: Failure to Make a Hazardous Waste Determination, as required by LAC:V.1103 [40 C.F.R. § 262.11]

1. Gravity-based penalty from matrix

\$1,100

a. Potential for harm

Minor

b. Extent of deviation

Moderate

Number of days of violation for which a penalty is proposed - (0)

**Total & Proposed Penalty for Count III:** 

\$1,100

Count IV: Used Oil Storage: Failure to Label Used Oil Storage Tanks with the words "Used Oil", as required by LAC:V.4301 [40 C.F.R. § 279.22]

1. Gravity-based penalty from matrix

\$330

a.

Potential for harm

Minor

b.

Extent of deviation

Minor

Number of days of violation for which a penalty is proposed - (0)

**Total & Proposed Penalty for Count IV:** 

\$ 330

SUMMARY OF PROPOSED PENALTIES:

Count I:

\$8,250

Count II:

\$330

Count III:

\$1,100

Count IV:

\$330

TOTAL PROPOSED RCRA PENALTY:

\$10,010.00

#### VII.

#### **NOTICE OF OPPORTUNITY TO REQUEST A HEARING**

Where Respondent (1) contests any material fact, upon which the Complaint is based;

(2) contends that the amount of the penalty proposed in the Complaint is inappropriate; or

(3) contends that it is entitled to a judgment as a matter of law, Respondent shall file a written

Answer to the Complaint with the Regional Hearing Clerk, Region 6, within thirty (30) days after the filing of the Complaint.

The Answer shall clearly and directly admit, deny, or explain each of the factual allegations contained in the Complaint with regard to which Respondent has any knowledge. Where the Respondent has no knowledge of a particular factual allegation and so states, the allegation is deemed denied. Failure of Respondent to admit, deny, or explain any material factual allegation contained in the Complaint constitutes an admission of the allegation.

The Answer shall also state (1) the circumstances or arguments which are alleged to constitute the grounds of defense; (2) the facts which Respondent disputes; (3) the basis for opposing any proposed relief; and (4) whether a hearing is requested. A hearing upon the issues raised by the Complaint and Answer shall be held upon request of the Respondent in the Answer.

The hearing, if requested, will be conducted in accordance with the provisions of the Administrative Procedure Act (5 U.S.C. § 552 et seq.), and the Consolidated Rules of Practice.

codified at 40 C.F.R. Part 22. A copy of these Rules is enclosed. Respondent may retain counsel to represent it at the hearing.

The Regional Hearing Clerk's address is:

Regional Hearing Clerk
U.S. Environmental Protection Agency
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

A copy of this Answer shall also be sent to Mr. Scott McDonald, Assistant Regional

Counsel (6RC-EW), U.S. Environmental Protection Agency, Region 6, 1445 Ross Avenue,

Dallas, Texas 75202-2733

#### VIII.

## **DEFAULT ORDER**

If Respondent fails to file an Answer within thirty (30) days of the filing date of this Complaint, it may be found to be in default pursuant to 40 C.F.R. § 22.17. For purposes of this action, default by Respondent constitutes an admission of all facts alleged in the Complaint and a waiver of Respondent's right to a hearing under Section 3008 of RCRA, 42 U.S.C. § 6928, concerning such factual allegations. The proposed penalty shall become due and payable by Respondent without further proceedings thirty (30) days after issuance of a Final Order upon Default. Upon issuance of the Final Order upon Default, Respondent must immediately comply with the RCRA Compliance Order provisions in the Complaint.

IX.

#### SETTLEMENT CONFERENCE

Whether or not the Respondent requests a hearing, it may confer with Complainant concerning settlement. EPA encourages settlement consistent with the provisions and objectives of RCRA and applicable regulations. A request for a settlement conference does not extend the thirty (30) day period during which the written Answer and a request for hearing must be submitted. The settlement conference procedure may be pursued as an alternative to and simultaneous with the formal hearing procedures. Respondent may appear at the settlement conference and/or be represented by counsel.

Any settlement reached by the parties shall be finalized upon the issuance of a written Consent Order by the Regional Administrator, EPA Region 6, in accordance with 40 C.F.R. § 22.18. The issuance of a Consent Order shall constitute a waiver of Respondent's right to request a hearing on any matter stipulated to therein.

To explore the possibility of settlement in this matter, contact the attorney assigned to this case, Scott McDonald, who may be reached at (214) 665-2718 or Carol D. Peters-Wagnon, Chief, Arkansas, Louisiana, Oklahoma and New Mexico Section (ALONM 6EN-HS), RCRA Enforcement Branch, U.S. EPA, Region 6, 1445 Ross Avenue, Suite 1200, Dallas, Texas 75202-2733, or telephone (214) 665-2192.

Samuel Coleman, P.E.

Director

Compliance Assurance and Enforcement Division

Dated this 1844 day of June 2003, at Dallas, Texas

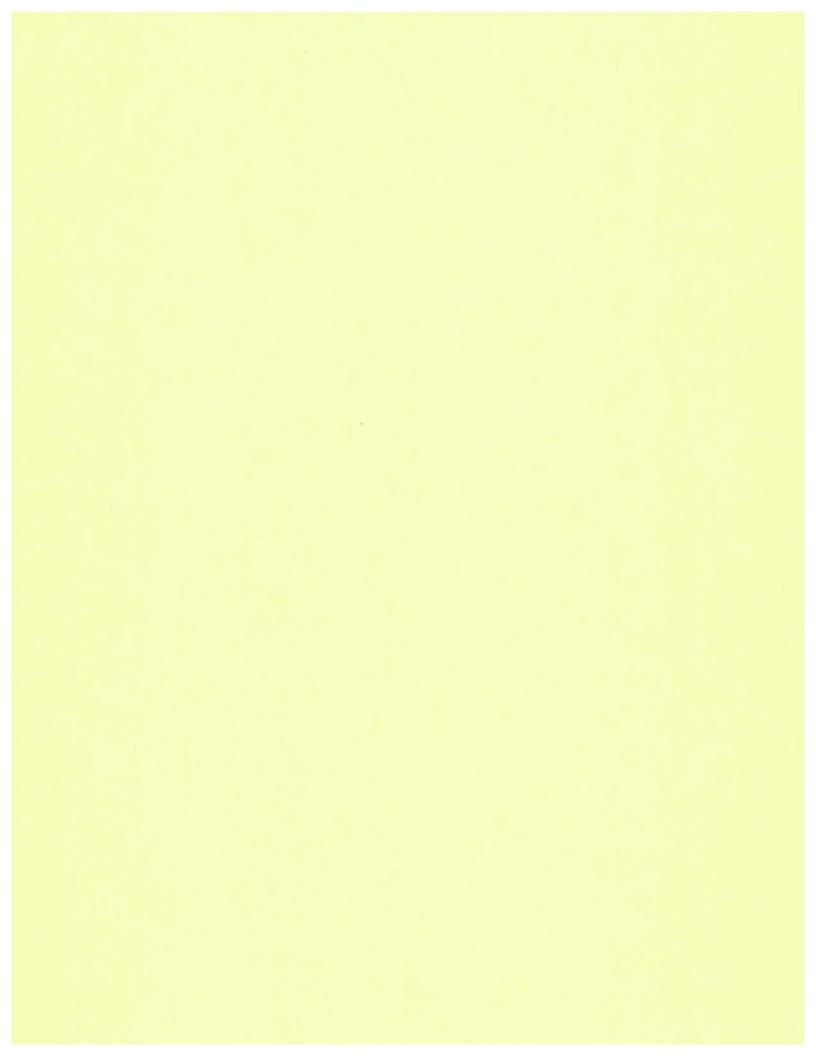
#### CERTIFICATE OF SERVICE

I hereby certify that the original of the foregoing Complaint, Compliance Order, and Notice of Opportunity for Hearing concerning Dresser Inc., Alexandria, Louisiana, Docket No. RCRA-06-2003-0903, was filed with the Regional Hearing Clerk, U.S. EPA, Region 6, Dallas, Texas, and a true and correct copy of such Complaint, together with a copy of the Consolidated Rules (40 C.F.R. Part 22), was placed in the United States mail, postage prepaid, certified mail, return receipt requested, on this 18<sup>th</sup> day of June 2003, addressed to the following:

CERTIFIED MAIL - RETURN RECEIPT REQUESTED 1001 0360 0001 13610549

Corporation Service Company Registered Agent 320 Somerulos Street Baton Rouge, Louisiana 70802-6129

Lori Jackson, Paralegal









December 11, 2002

U. S. Environmental Protection Agency 1445 Ross Avenue Suite 1200 Dallas, Texas 75202-2733

Attention: Craig Lutz (Fax) (214)-665-7264

Review June 14, 2001 inspection of Dresser Flow Control Alex. La.

Problem areas referenced: (From Phone call on 11/22 by Craig Lutz and Scott McDonald):

1. Storage of hazardous waste (4 drums) greater than 90 days. Reference: (June 14, 2001 inspection Photo No. 22)

#### Corrective action:

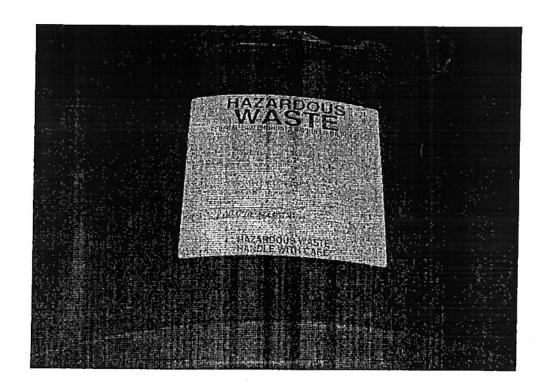
Dresser Flow Control (DFC) had been using Chemical Waste Management, reusable drums to accumulate, and shipping out for disposal acids and bases from the Dept. 188 zinc phosphate processing line. The waste stream generation (zinc phosphating line) process had greatly decreased in volume, and the time to accumulate enough for a 5,000-gallon tank truck had ran over the limit.

Dresser Flow Control has changed to a new vendor that will take small 8-10 drum loads (Pollution Control Industries) of waste acids and bases, this change permits us to be much more timely in our disposal of waste. An added benefit is it also gets away from drums that may have been labeled 10 or more times, with label never getting removed sufficiently causing miss identification potential.

F:\usr\taturner\My Documents\EPA Extension June 2002.doc Page 21 of 27



Photo below of corrective action:



2. Blasting sand collection container below valve repair sandblast cabinet not labeled as satellite accumulation point.

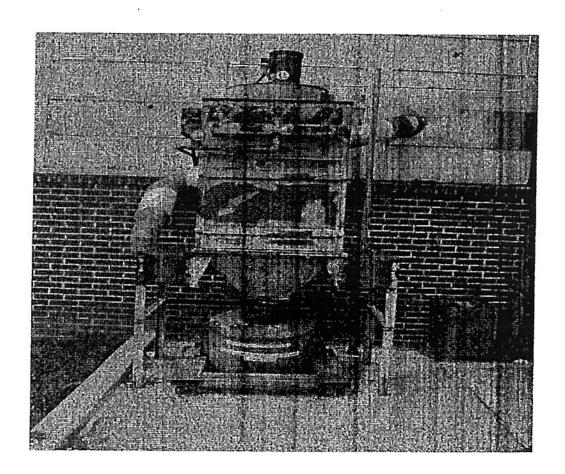
Reference: (June 14, 2001 inspection Photo No. 9)

#### Corrective action:

The original understanding was that a satellite collection container was one that some one had to physically place waste into. This container was an automatic sand blast cabinet dumping mechanism, which we did not label as a satellite accumulation point. It was immediately labeled the next day as a satellite accumulation point.

Photo below:

04, 0.00FM, UNESSEN IVO F. E. ,318+0+050



;318+640+6322 #

3. Using a lacquer thinner paint that has more than 10% by volume of listed material specifically F005:

Reference: (June 14, 2001 inspection Photo No. 4)

#### Corrective Action:

We have sourced another lacquer thinner with a lower VOC content of the F 005 listings and are proving it out to work in all processes:

#### MSDS sheet attached:

4. Container of non-hazardous incinerator ashes not covered:

Reference: (June 14, 2001 inspection Photo No. 16)

#### Corrective action:

As per the informational report and the attached letter to Omega One (Now IESI) we have worked to ensure our incinerator ashes are non-hazardous (Evidenced by the 68 TCLPS ran over one year time after the collection process of lead seals was implemented and no lead was detected.)

The non-hazardous is then transported by IESI as an industrial non-hazardous solid waste to a permitted facility the LaSalle-Grant Landfill. This landfill is permitted to properly dispose of industrial non-hazardous solid waste Permit No. P-0119RI and State of Louisiana Site ID no. D-059-1658:

The D008 classification is still on our HW-1, but the non hazardous waste is not shipped as a D008 waste code. We have made design changes to the process of sealing our valves from lead to Aluminum seals, which will be implemented in FY 2003. We then plan to completely update our HW-1.

5. Labeling of tanks for used oil/water solution as waste oil.

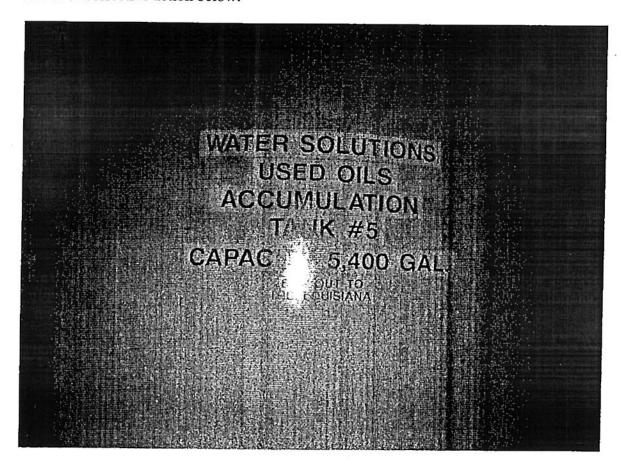
Reference: (June 14, 2001 inspection Photo No. 14)

#### Corrective action:

The tanks had been set up when we were using Chemical Waste Management to transport, dispose of and solidify the oil/water solution at the Caryless facility.

We then transferred over to International Petroleum Corporation (IPC) to collect as used oil/water solution for recycling and had not labeled the tanks as used oil/water solutions. This was corrected the next day after the inspection.

Photo of corrective action below:



#### Summary:

Our continued goal is to exceed environmental and safety regulations. We started our program in 1980 and have had three (3) RCRA inspections over the years, 1980, 1991 and 1995. (Two federal and one state).

We are in the process of re-assessing our focus and have expanded the job duties to two (2) more employees, Earl Wenzel, new Plant Engineer and Scott Pippens, machine cleaner to work and be trained in waste management.

We plan to re-focus and expand the duties of existing employees and establish goals to help improve the environmental and safety results of the department. We would request a favorable consideration due to corrective action items and continued efforts to comply and improve regulatory goals for Dresser Flow Control.

If I can be of any further assistance or provide any further clarification of our processes or waste management at Dresser Flow Control, Alex. La. Please do not hesitate to call, fax, or e-mail at below addresses.

erry A Turner

Copy Curt Hensley Earl Wenzel

Attached:

Letter to Omega One Dated Jan 13, 1999 MSDS Sheet on Sherwin Williams R2K5 – Low VOC – High Flash Naphtha:

Dresser IVO PO Box 1430 Alexandria, La. 71309-1430

Plant Engineering Department (318)640-6245 Phone (318)640-6322 Fax

Date: Jan. 13, 99

Omega One Inc. 1515 England Drive Alexandria, La. 71303-4109 Fax (318)442-9704

Attn. Bob Beall, Operations Manager

Re: Plant trash Incinerator Ashes

Bob as per our review last week, we are requesting that the subject incinerator ashes be set up With Omega One's open top 35 CY trash Dumpster and these are not hazardous waste. The ashes Are generated from the incineration of plant trash (boxes, paper, wood, vending machine area, trash And normal plant operations) No hazardous waste of bits medical waste is incinerated.

As requested we are furnishing an attached TCLP ran per EPA, La DEQ approved methods And the incinerator ashes are non-hazardous by this test. (Copy Attached): TCLP ran for EPA Toxic, Corrosivity, Reactive, and Ignitable. Please review and get back to me at your earliest convenience with an Approval to ship out with the 35 CY non-hazardous plant trash container and the method of loading That would be best for both Dresser and Omega One, we currently have 4-2 CY self dumping Hoppers that are ready to load.

Also please advise which disposal site would be used and site LaDEQ approval ID and That it is permitted for industrial solid waste.

Terry Turner

Attached SPL --- TCLP Analysis of Plant Trash incinerator Ashes:

CC: Curtis Hensley, Dresser IVO
Lenny Humphreys, Dresser IVO

Ref Copy! Solid Wasts Portfils

DOCUMENT 3(K):

. . . . . . . . . . . . . . . . . . .

#### MATERIAL SAFETY DATA SHEET

R2K5 13 00

PRODUCT I		^					MIS CODES	:	
PRODUCT	NUNDER					Heal			2*
R2K5						Flat	mmability		2
VEX.000.000						Read	ctivity		Ø
PRODUCT									
	ash Naphthe				FME	מכטבע דו	ELEPHONE N	in.	
MANUFACTURER'S NAME THE SHERWIN-WILLIAMS COMPANY					16) 566-2		.0.		
1.77	combecf Washing HEXAIN-AILLIVU				\_	10, 200 7	-517		
	land, OH 44115						*		
DATE OF	PREPARATION						TELEPHONE	NO.	
31-JA	N-02				(216) 566-2902				
========					2 CN	**************************************	ressesses Cuto		==:
	Section 2				UNI.		VAPOR	PRESS	HRI
X by WT	CAS No.	INCKEDIENT	. <b>.</b>						
1		Ethylbenzer							
		ACGIH	TLY	100				7.1	mr
				125		STEL			
		AKRO		100					
	9.	AHRO	PEL	125	ppm	STEL			
5	1330-20-7		T1 11	100				5. 9	m
		ACGIN	TLV	100 150	ppm	STEL		J. J	
		AK2D		100		J. LLD			
		OSHA	700 700 700	150		STEL			
22	64742-95-6			Hydroca					
		ACGIH	TLY	Not Av	ailal	ble		3.8	mu
		OSHA	PEL	Not Av	ailal	ble			
5	98-82-8			-					1000000
		ACGIH		50				10	m
	000 200 100	AKZO		. 50	ppm				
27	108-67-8	1,3,5-Trime						2	mn
	N	ACGIR		25	bbu bbu			-	
40	95-63-6	1, 2, 4-Trime							
40	75 65 6	ACGIH			ppm			2.03	mo
		ARZO		25					

#### ROUTES OF EXPOSURE

Exposure may be by INHALATION and/or SKIN or EYE contact, depending on conditions of use. To minimize exposure, follow recommendations for proper use, ventilation, and personal protective equipment.

R2K5

page 2

EFFECTS OF OVEREXPOSURE

Irritation of eyes, skin and respiratory system. May cause nervous system depression. Extreme overexposure may result in unconsciousness and possibly death.

SIGNS AND SYMPTOMS OF OVEREXPOSURE

Headache, dizziness, nausea, and loss of coordination are indications of excessive exposure to vapors or spray mists.

Redness and itching or burning sensation may indicate eye or excessive skin exposure.

MEDICAL CONDITIONS AGGRAVATED BY EXPOSURE

None generally recognized.

CANCER INFORMATION

For complete discussion of toxicology data refer to Section 11.

Section 4 -- FIRST AID MEASURES

If INHALED: If affected, remove from exposure. Restore breathing.

Keep warm and quiet.

If an SKIN: Wash effected area thoroughly with soap and water.

Remove contaminated clothing and launder before re-use.

If in EYES: Flush eyes with large amounts of water for 15 minutes.

Get medical attention.

If SWALLOWED: Do not induce vomiting.

Get medical attention immediately.

Section 5 -- FIRE FIGHTING MEASURES

FLASH POINT LEL UEL 105 F PMCC 0.7 7.0

FLAMMABILITY CLASSIFICATION

Combustible, Flash above 99 and below 200 F

EXTINGUISHING MEDIA

Carbon Dioxide, Dry Chemical, Foam

UNUSUAL FIRE AND EXPLOSION HAZARDS

Keep containers tightly closed. Isolate from heat, electrical equipment, sparks, and open flame. Closed containers may explode when exposed to extreme heat. Application to hot surfaces requires special precautions. During emergency conditions overexposure to decomposition products may cause a health hazard. Symptoms may not be immediately apparent. Obtain medical attention.

SPECIAL FIRE FIGHTING PROCEDURES

Full protective equipment including self-contained breathing apparatus should be used. Water spray may be ineffective. If water is used, fog nozzles are preferable. Water may be used to cool closed containers to prevent pressure build-up and possible autoignition or explosion when exposed to extreme heat.

Section 6 -- ACCIDENTAL RELEASE MEASURES

STEPS TO BE TAKEN IN CASE MATERIAL IS RELEASED OR SPILLED

Remove all sources of ignition. Ventilate and remove with inert absorbent.

R2K5 

Section 7 -- HANDLING AND STORAGE 

DOL STORAGE CATEGORY

PRECAUTIONS TO BE TAKEN IN HANDLING AND STORAGE

Contents are COMBUSTIBLE. Keep away from heat and open flame. Consult NFPA Code. Use approved Bonding and Grounding procedures.

Keep container closed when not in use. Transfer only to approved containers with complete and appropriate labeling. Do not take internally. Keep out of the reach of children. 

\_\_\_\_\_\_

Section 8 -- EXPOSURE CONTROLS/PERSONAL PROTECTION

#### PRECAUTIONS TO BE TAKEN IN USE

Use only with adequate ventilation. Avoid breathing vapor and spray mist. Avoid contact with skin and eyes. Wash hands after using. VENTILATION

Local exhaust preferable. General exhaust acceptable if the exposure to materials in Section 2 is maintained below applicable exposure limits. Refer to OSHA Standards 1910.94, 1910.107, 1910.108. RESPIRATORY PROTECTION

If personal exposure cannot be controlled below applicable limits by ventilation, year a properly fitted organic vapor/particulate respirator approved by NIOSH/MSHA for protection against materials in Section 2. PROTECTIVE GLOVES

Wear gloves which are recommended by glove supplier for protection against materials in Section 2.

EYE PROTECTION

Wear safety spectacles with unperforated sideshields. OTHER PRECAUTIONS

Intentional misuse by deliberately concentrating and inhaling the contents can be harmful or fatal.

\_\_\_\_\_\_

Section 9 -- PHYSICAL AND CHEMICAL PROPERTIES

PRODUCT WEIGHT 867 q/l 7.24 lb/gal

SPECIFIC GRAVITY 0.87

BUILING POINT 277 - 360 F 136 - 182 C

MELTING POINT Not Available

VOLATILE VOLUME 100 X

EVAPORATION RATE Slover than ether VAPOR DENSITY Heavier than air

SOLUBILITY IN WATER N. A.

VOLATILE ORGANIC COMPOUNDS (VOC Theoretical)

7.24 lb/gal 867 g/l Less Federally Exempt Solvents

7.24 lb/gal 867 g/l Emitted VOC

Section 10 -- STABILITY AND REACTIVITY

STABILITY -- Stable

CONDITIONS TO AVOID None known. INCOMPATIBILITY None known.

Z-11-02; J.JOPWI,DRESSER IVO F.E.

,315+640+6322

RZK5

page 4

HAZARDOUS DECOMPOSITION PRODUCTS

By fire: Carbon Dioxide, Carbon Monoxide HAZARDOUS POLYMERIZATION

Will not occur

115511980#1851180ppx:464615555552424555572411132124164646464646464646464

Section 11 -- TOXICOLOGICAL INFORMATION

#### CHRONIC HEALTH HAZARDS

Ethylbenzene is classified by IARC as possibly carcinogenic to humans (2B) based on inadequate evidence in humans and sufficient evidence in laboratory animals. Lifetime inhalation exposure of rats and mice to high ethylbenzene concentrations resulted in increases in certain types of cancer, including kidney tumors in rats and lung and liver tumors in mice. These effects were not observed in animals exposed to lower concentrations. There is no evidence that ethylbenzene causes cancer in humans.

Prolonged overexposure to solvent ingredients in Section 2 may cause adverse effects to the liver, urinary and reproductive systems.

Reports have associated repeated and prolonged overexposure to solvents with permanent brain and nervous system damage.

TOY	ICOL	UEA	DATA	

CAS No. Ingredient Name

100-41-4	Ethylbenzene			
	LC50	RAT	4HR	Not Available
	LD50	RAT		3500 mg/kg
1330-20-7	Xylene.			
	LC50	RAT	4HR	5000 ppm
	LD50	RAT		4300 mg/kg
64742-95-6	Light Aromatic Hyd	rocarbon	18.	
	LC50	RAT	AHR	Not Available
	LD50	RAT		Not Available
98-82-8	Cumene.			
	LC50	RAT	4HR	Not Available
	LD50	RAT		1400 mg/kg
103-57-B	1, 3, 5-Trimethylben	zene		
	LC50	RAT	4HR	Not Available
	LDSØ	RAT		Not Available
95-63-6	1, 2, 4-Trimethylben	zene		
	LC50	RAT	4HR	Not Available
	LD50	RAT		Not Available

Section 12 -- ECOLOGICAL INFORMATION

ECOTOXICOLOGICAL INFORMATION

No data available.

Section 13 -- DISPOSAL CONSIDERATIONS

#### WASTE DISPOSAL METHOD

Waste from this product may be hazardous as defined under the Resource Conservation and Recovery Act (RCRA) 40 CFR 261.

\_\_\_\_\_\_

Waste must be tested for ignitability to determine the applicable EPA hazardous waste numbers.

Incinerate in approved facility. Do not incinerate closed container. Dispose of in accordance with Federal, State/Provincial, and Local Continued on page 5

R2K5		page 5
4522223332754	##63 <b>#</b> #\$##################################	-4161696166666
regulations r	egarding pollution.	
22222222222	=======================================	*******************
Sec	tion 14 TRANSPORT INFORMATION	
No data av	ailable.	
	=======================================	22222232222222222222222222222222222222
Sec	tion 15 REGULATORY INFORMATIO	N
	CFR 372.65C) SUPPLIER NOTIFICATION	
CAS No.	CHEMICAL/COMPOUND	% by WT % Element
	Ethylbenzene	1
1330-20-7		5
98-82-8	Cumene.	5
95-63-6	1,2,4-Trimethylbenzene	40
CALIFORNIA PR	OPOSITION 65	
WARNING:	This product contains chemicals !	known to the State of
California to TSCA CERTIFIC	cause cancer and birth defects (	or other reproductive harm.
	als in this product are listed,	or are exempt from listing,
on the TSCA I		
*********		
Sec	tion 16 OTHER INFORMATION	

This product has been classified in accordance with the hazard criteria of the CPR and the MSDS contains all of the information required by the CPR.

The above information pertains to this product as currently formulated, and is based on the information available at this time. Addition of reducers or other additives to this product may substantially alter the composition and hazards of the product. Since conditions of use are outside our control, we make no warranties, express or implied, and assume no liability in connection with any use of this information.



June 17, 2002

U. S. Environmental Protection Agency 1445 Ross Avenue Suite 1200 Dallas. TX. 75202-2733

Attn: Craig Lutz (Fax)214-665-7264

As per our conversation I am requesting an extension for the report requested on the memo dated May 7, 2002. I was out of the plant the week of May 13, 02 and received your memo on return May 20, 2002. I had also set up the first week of June for my son to fly in from New York and could not cancel this week of vacation.

Thanks again for your understanding and assistance in this matter and I will have the information requested per the below schedule.

June 10 to June 21, 2002 Complete the manuscript for information requested:

June 24 to June 28, 2002 complete the report and all requested documentation.

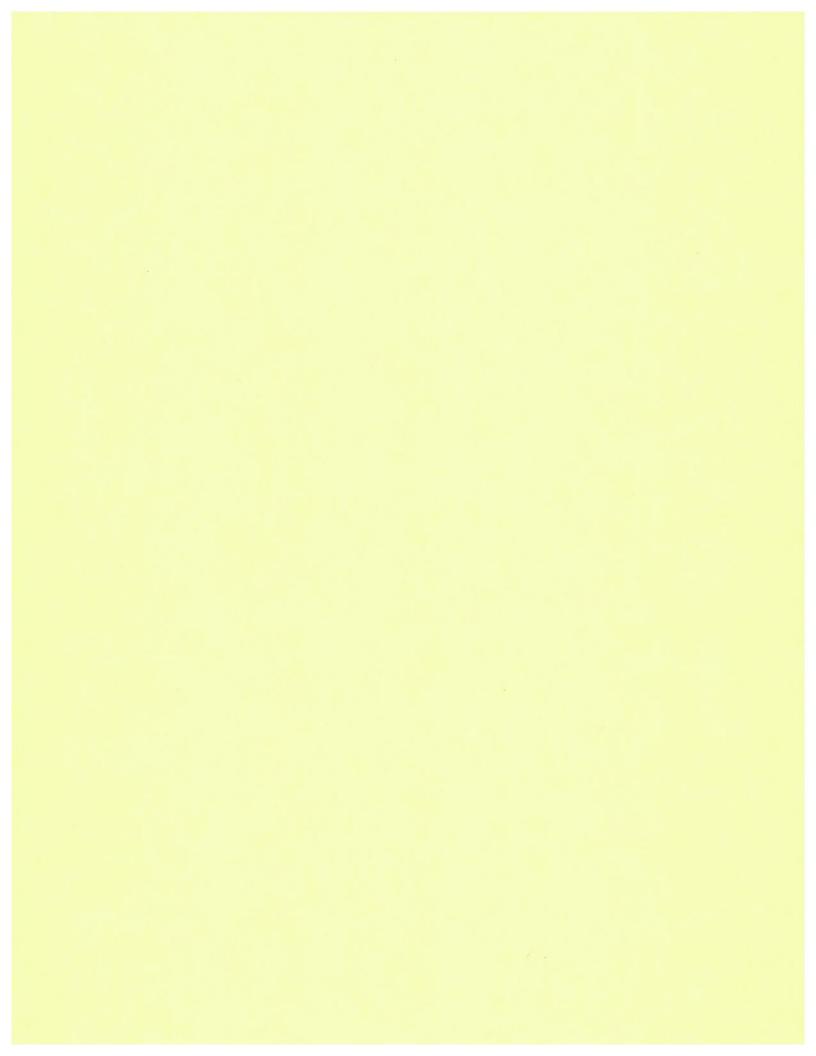
Mail the completed report via Priority Postal Service on June 28, 2002:

Sincerely Yours,

Terry A Turner, Manager Plant Engineering

CC: Curt Hensley, Director of Operations

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August 15, 2002

U. S. Environmental Protection Agency 1445 Ross Avenue Suite 1200 Dallas, TX, 75202-2733

Attn: Craig Lutz

In response to your request for information to review the waste management practices at the Dresser Measurement Alexandria, La. Plant we have made a manual with the below sections to address your questions 1-6.

Section 1 Questions 1 and 2

Section 2 Questions 3 with photographs and sample lead seals

Section 3 Questions 4 and 5

Section 4 Question 6 and summary

Craig if we can be any further assistance or further clarification is needed please do hesitate to call or fax at the below numbers.

Sincerely Yours

Curtis J. H∉nsley

CC: Terry A. Turner:

(318) 640-6474 Curt J. Hensley

(318) 640-6245 Terry A Turner

(318) 640-6322 Bobbe Guillory

(318) 640-6149 Earl Wenzel

Attached Statement of Certification (Enclosure B) Manual Sections 1-4

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#### **ENCLOSURE B**

## Dresser, Inc. LAD071940233

## STATEMENT OF CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining this information, I believe the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine or imprisonment.

Signature

Title

Date

# Section #1

#### **Section 1:**

#### Question No. 1 and No 2:

1. Provide the legal name and address of Dresser Flow Control located in Alexandria, Louisiana.

#### Answer to No. 1:

Mailing Address:

Dresser Measurement Division P. O. Box 1430 Alexandria, Louisiana 71309-1430

Physical Address:

Dresser Measurement Division Hwy 167 N @ 3220 Alexandria, Louisiana 71301

**Emergency Address** 

Dresser Measurement Division 8011 Shreveport Hwy Pineville, La. 71360

Legal Name:

Dresser Inc. 15455 Dallas Parkway Suite 100 Addison, Texas 75001

Answered by:

Terry A Turner

Consulted:

Louisiana Dept. of the Secretary of State

Documents (2) A Vendor Supplier Information sheet.

2. Provide the date and location of incorporation of Dresser, Inc. and identify the registered agent for Service of Process by Name and address:

#### Answer to No. 2:

Date of Incorporation:

January 29, 1999

Place of Incorporation:

State of Wilmington, Delaware

Registered Agent: Louisiana

Corporation Service Company 320 Summerset Blvd Baton Rouge, Louisiana

Answered by:

Terry A Turner

Consulted with:

State of Louisiana Secretary of state:

Documents with this question:

Document 2 (B)

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Dresser Flow Control DRESSER, INC.

P. O. Box 1430

US Hwy. 167N @ LA Hwy. 3225 Alexandria, Louisiana 71309-1430 Tel: 318/640-2250 • Fax: 318/640-6222

## CREDIT/SUPPLIER INFORMATION

The following information is provided and must be maintained in the strictest of confidence.

Purchase orders are required.

FIRM							
Name: Dresser Flow Control DRESSER, INC. P. O. Box 1430 US Hwy.167 N @ LA Hwy.3225	Corporate Office: DRESSER, INC. 15455 Dallas Parkway Suite 1100 Addison, TX 75001		Telephone/Fax Nos. 318/640-2250 318/640-6222		C   C   P	Remit Address: Presser Flow Control PRESSER, INC. O. Box 360391 Pittsburgh, PA	
Alexandria, LA 71309-1430						15252-6391	
BANK REFERENCE							
Bank Account No. Citibank 3860-39			7 Telephone			2) 323-3612	
Address	City/State	3860-3907 City/State		Zip Code			
One Penn's Way	New Cast	le, DE		19720			
el	MARK	ETI	NG				
Contact R. Nichols	Telephone No. (318) 64	0-603	1	Fax No.	(319)	640-6222	
K. Menois	ACCOUNTS		The second second second second		(310)	040-0222	
Contact	Telephone No.	IXEC.	LIVADLE	Fax No.			
J. Parish		(318) 640-6014		(318) 640-6323			
	ACCOUNT	S PA	YABLE				
Contact Telephone		Fax No. (210) 540		Submit Invoices to			
R. Madeo (	318) 640-6008	(318) 640-6298 Accounts Payable Dept					
Contact	PURCI	IASI	NG	F N-			
M. Carter	(318) 64	0-609	3	Fax No.	(318)	640-6263	
	MISCEL	LANI	EOUS			¥.	
FOB Alexandria (Shippi	na Point)			Ne	et 30		
	N & BRADSTRE	FT /	ΤΔΥΡΔΥΕ		50	4	
Dun & Bradstreet	Federal T	ender end the lower		mayers servers	tate of I	ouisiana Tax ID No.	
Number Rating							
07 194 0233B 5A2	75-2	79536	5	6034292021W		292021W	
INCORPORATION							
State of Incorporation	Date of Incorporatio	n		Business	Establi	shed	
Delaware Decembe			r 18, 1998			1881	
Nature of Business			SIC (Product Class Code)				
Manufacturer of industrial		34916					
PRINCIPAL OFFICERS							
*lame		Title	. 202.10				
J. R. Fentem	Vice President Operations						
J. R. Jennings Controller							

Controller



SECRETARY OF STATE

As Secretary of State, of the State of Louisiana, I do hereby Certify that

an Application for Certificate of Authority of

DRESSER, INC.

Domiciled at WILMINGTON, DELAWARE, was filed in this Office on January 29, 1999,

I further certify that no certificate of withdrawal has been issued.

In testimony whereof, I have hexeunto set my hand and caused the Seal of my Office to be affixed at the City of Baton Rouge on,

Jox. W. John

BRI 34736046F State



## Section #2

### Section 2:

## Question no. 3. With Photographs:

3. Describe the waste streams that are feed stock for the incinerator. Include in the descriptions the information used to characterize the material (i.e. sampling data, process knowledge) and the amount of material in each waste stream. If using process knowledge to characterize the waste, provide the rationale used to characterize the waste and all supporting documentation.

#### Answer No. 3:

The waste stream that makes up the feed stock for the incinerator (Facility trash – Air Permit Letter to LaDEQ 1980 Document 3A1) is from two (2) areas in the facility. (Offices trash collection Document 3 (A) photograph no. 3A) and (Shop trash collection photograph 3B-3E) make up the waste stream feedstock. The incinerator was sized accordingly in the 1980's and the waste stream feedstock was monitored for one month (Oct. 1980) an averaged an estimated total of 5,000 to 8,000 lbs. trash per day. Incinerator was sized to handle a load of approximately 500-800 lbs. per hour of "Type 0" trash and normally runs 2 shifts four (4) days per week.

### Process knowledge of office trash:

Rationale used to characterize the waste visual inspection and incoming materials to office:

Offices – Paper, computer runs (paper), cups, vending machine empty containers and foods, coffee bar cups, coffee grounds, and copy machine paper, magazines, books, and some empty plastics, and plastic trash bags. Two (2) inventories done on 2 cubic foot containers used to pick up offices trash one 2002 and one 1980.

### Amount of materials:

Offices: Main front, Manufacturing Mezzanine, Maintenance Mezzanine, R&D offices, Shipping Rec. offices and Human Resources offices: (Approximately 56,000 SF)

Normal daily collection: Two (2) – two cubic yards (CY) dumpsters and one curbside (1 CY) of computer paper. Dresser has used three (3)-recycling companies, but all are out of business and no recycling market in this area. Est. approx. (1,100 lbs. per day):

Composition	Percent	Weights
Paper	45%	440
Computer paper	30%	330
Coffee bar trash	2%	22
Copy machine	20%	220
Food/vending machine	3%	33
Magazines	5%	55
Totals	100%	1100 lbs.



FRINK A. ASHBY, JR. SECRETAR!

## DEPARTMENT OF NATURAL RESOURCES OFFICE OF ENVIRONMENTAL AFFAIRS AIR QUALITY DIVISION

October 27, 1981

ASSETANT SECRETARY



Mr. E. J. McDonald Chief Plant Engineer Dresser Industries Industrial Valve Operations P. O. Box 1430 Alexandria, Louisiana 71501

Dear Mr. McDonald:

The Consumat C-225 (Type 0 waste, 850/hr; Type 1 waste, 1100/hr; Type 2 waste, 1050/hr; Type 3 waste, 815/hr.) Incinerator has been reviewed by our staff and has been approved for installation only at your plant in Tiega, Louisiana (Rapides Parish) subject to performance evaluation. This approval is contingent on the incinerator operating within the current Louisiana Air Quality Regulations for emission of smoke and particulate. It is further stipulated that:

- The incinerator is constructed and installed as shown in the approved design drawings;
- The incinerator is not required to burn more than its rated capacity and handle only the type waste it is designed for;
- 3) The incinerator is maintained and operated in accord with the manufacturer's recommendations and so as to satisfactorily dispose of the waste without causing a sanitary or air pollution problem;
- 4) That all necessary permits are obtained and all local and/or other state requirements are met;
- A manufacturer's name place giving manufacturer's name, model number, capacity, type waste, etc. is installed on the incinerator and burner.
- 6) The installation will comply with Section 7.3.4 of the Solid Waste Management Plan.

## DOCUMENT 3(A1):

Mr. E. J. McDonald October 27, 1981 Page -2-

The fee for this permit is \$500.00. We also wish to emphasize that this installation is subject to performance evaluation and must meet all Louisiana Air Quality Regulations.

Sincerely

James H. Stone, Jr. Chemical Engineer

JHS/ner

3

cc: Ms. Barbara Delatte, Solid Waste Management Mr. Robnie Crochet, Consumat Systems, Inc.

## **OFFICES TRASH**



PHOTOGRAPH 3(A)

DAILY AVERAGES OF COLLECTION:

2-2 CUBIC YARD (CY) HOPPERS – OFFICES TRASH
1-1 CUBIC YARD CURB SIDE DUMPSTER – COMPUTER PAPER

DOCUMENT: QUESTION NO. 3 -OFFICES TRASH PHOTOGRAPH 3(A):

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**DOCUMENT 3(A):** 

### Process knowledge of shop trash:

Rationale used to characterize the waste visual inspection and incoming materials to shop:

Shop – Paper, vending machine empty containers and foods, coffee bar cups, coffee grounds, and scrap wood pallets, wooden shipping crates, cardboard, packaging materials, some empty plastics, plastic trash bags, and sometimes metals (lead seals) from machine processes get co-mingled. Has done lots of education, not nearly as bad, and housekeeping has improved tremendously last several years. Two (2) inventories done on 2 cubic foot containers used to pick up offices trash one 2002 and one 1980.

### Amount of materials:

Shop: Machine shop, receiving, shipping, assembly, test, maintenance, R&D, inspection, weld shop, tool room, clean room. (Approximately 247,000 SF)

Normal daily collection: Four (4) – two cubic yard (CY) dumpsters from shop general trash collection. Three (3) from receiving, One (1) from D 163 paint/assembly area, one (1) from D 163 valve assembly area:

Estimate approximately (4400 lbs. per day average):

Composition	Percent	Weights
Paper	13%	572
Wooden shipping crates	20%	1100
Packaging materials	25%	1100
Food/vending machine	5%	220
Magazines, Newspapers	2%	88
Cardboard	10%	440
Wooden pallets	20%	880
Totals	100%	4400 Lbs.

Universal Waste is collected separately

Used Battery Collection area Used Light bulbs Used Lead Acid Batteries:

**Chronology** of the plant trash incineration and how the lead hazardous waste classification was issued to a collective area of waste management.

### 1980 - 89

Louisiana Solid and hazardous waste regulations were in the early stages of development and moving from an open landfill disposal system to a secured landfill managed classified system. In the 1980's after the RCRA regulations were passed through congress, and Louisiana started to work in the environmental waste disposal area. Dresser Alexandria La. was overly conservative in that there was no secured/permitted landfill, and the only parish operator Delaney Can Company sold out to Waste Management. Dresser Alexandria, then decided to dispose of all its solid waste

to a hazardous waste landfill to minimize liability as the city of Alexandria landfill was under closure order.

#### 1990-93

In 1990 after Louisiana begin to adopt the EPA regulations to manage and permit all the disposal facilities in the state, and EPA, begin the Land Bans. When the Third Thirds land ban was issued Dresser Alexandria had commingled all the solid waste to include incinerator ashes and this waste stream of floor sweepings, incinerator ashes, abrasives solids, paint booth solids, and other blasting sands was classified as D008 after the ashes TCLP (Document 4A) was ran. The waste profile (LCHA 5350) document 3(K) was all co-mingled and disposed of at the Chemical waste management facility (EPA ID no. LAD 000777201) an EPA permitted site to handle hazardous and industrial waste.

#### 1993-94

In 1993 after the third thirds land ban was finalized Dresser began to perform TCLP'S to see how this new regulation affected this waste stream. The incinerator ashes TCLP (document 4A) had lead at 18 PPM.

#### 1993-1996

We began to work with all employees trying to identify the source of lead getting into the incinerator. With the union/management assistance it was discovered that some times the lead seals would be damaged, broken, or cut and then swept up, or picked up and thrown into the shop trash containers. Cap and seal process work station (photograph 3(F) is the primary place where this process occurs, completed valve (Photograph 3 H and sample lead seals Photograph 3(I) and a separate collection container system (Photograph 3(G) was instituted. For one year we ran TCLP's (1993 to 1994) to verify the collection system was working and that lead was no longer in the incinerator ashes (TCLP's Document 4B – 33 pages of TCLP's metals only all below 5 PPM).

### 1996-2002:

But still with no permitted land fill site in Rapdies' parish, Dresser still shipped out any collection of solids that was contaminated to the Lake Charles facility under Profile LCHA 54350: (Document 3:J) The non-hazardous waste incinerator ashes went to an approved industrial solid waste landfill. (Document 3K):

### 2002-2004

The lead seals will be phased out and replaced with Aluminum in latter part of 2003-2004 and should eliminate the lead from getting into the waste stream completely.

Answered by: Terry A Turner

Consulted with: D. K. Sharma, N. Mayeaux, J. Pinckley; Earl Wenzel:

Photographs with question 3 – Shop Trash attached:

DOCUMENT 3(B):

DOCUMENT 3(C)

DOCUMENT 3(D)

DOCUMENT 3(D)

DOCUMENT 3(E)

DOCUMENT 3(F)

DOCUMENT 3(F)

DOCUMENT 3(G)

DOCUMENT 3(G)

DOCUMENT 3(G)

DOCUMENT 3(H)

- Shop trash collected from the D 163 (SRV flanged assembly and paint booth)

- Shop trash collected from the D 163 HP assembly, valve repair and clean room

- Cap and seal process area at D 163

- Discarded lead seal collection container

- Completed Safety Relief Valve with lead seals attached

DOCUMENT 3(I) - Sample lead seals

DOCUMENT 3(K) - Hazardous waste solids profile LCHA 54350

DOCUMENT 3(L) - Non-hazardous incinerator ashes to industrial solid waste land fill



PHOTOGRAPH 3(B)

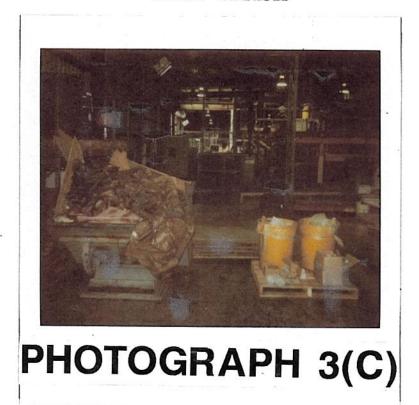
DAILY AVERAGES OF COLLECTION:

4-2 CUBIC YARD (CY) HOPPERS - SHOP TRASH-ALL OVER

DOCUMENT: QUESTION NO. 3 –<u>SHOP TRASH PHOTOGRAPH 3(B):</u> DAILY PICK UP OF TRASH THROUGHOUT SHOP:

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DOCUMENT 3(B):



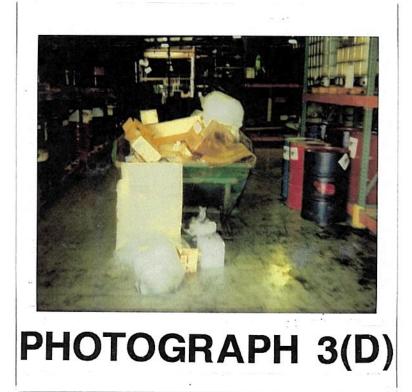
DAILY AVERAGES OF COLLECTION:

3-2 CUBIC YARD (CY) HOPPERS - RECEIVING TRASH

DOCUMENT: QUESTION NO. 3 –SHOP TRASH PHOTOGRAPH 3(C): RECEIVING DOCK – IN BOUND FREIGHT AND STRAPPING, PACKAGING:

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DOCUMENT 3(C):



DAILY AVERAGES OF COLLECTION:

1-2 CUBIC YARD (CY) HOPPERS - SHOP TRASH

DOCUMENT: QUESTION NO. 3 –SHOP TRASH PHOTOGRAPH 3(D): TRASH GENERATED AT THE D 163 PAINT BOOTH – FLANGED ASSEMBLY AREA:

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**DOCUMENT 3(D):** 



# PHOTOGRAPH 3(E)

DAILY AVERAGES OF COLLECTION:

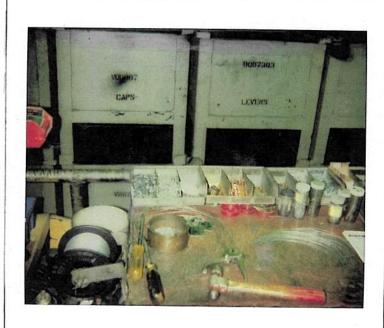
1-1 CUBIC YARD (CY) HOPPERS - SHOP TRASH

DOCUMENT: QUESTION NO. 3 –SHOP TRASH PHOTOGRAPH 3(E): TRASH COLLECTED DAILY FROM D 163 FLANGED AND HIGH PRESSURE ASSEMBLY, CLEAN ROOM, AND VALVE REPAIR:

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DOCUMENT 3(E):

## CAP AND SEAL WORK STATION:



PHOTOGRAPH 3(F)

VAVLE CAP AND SEAL AREA WHERE LEAD SEALS ARE APPLIED TO PRODUCT:

DOCUMENT: QUESTION NO. 3 -CAP AND SEAL AREA 3(F)

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DOCUMENT 3(F):

## DAMAGED OR USED LEAD SEAL COLLECTION



PHOTOGRAPH 3(G)

VALVE CAP & SEAL - USED OR SCRAPPED LEAD SEAL CONTAINER

DOCUMENT: QUESTION NO. 3 –LEAD SEAL COLLECTION CONTAINER PHOTOGRAPH 3(G): USED OR SCRAPPED LEAD SEALS:

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DOCUMENT 3(G):

## LEAD SEALED VALVE



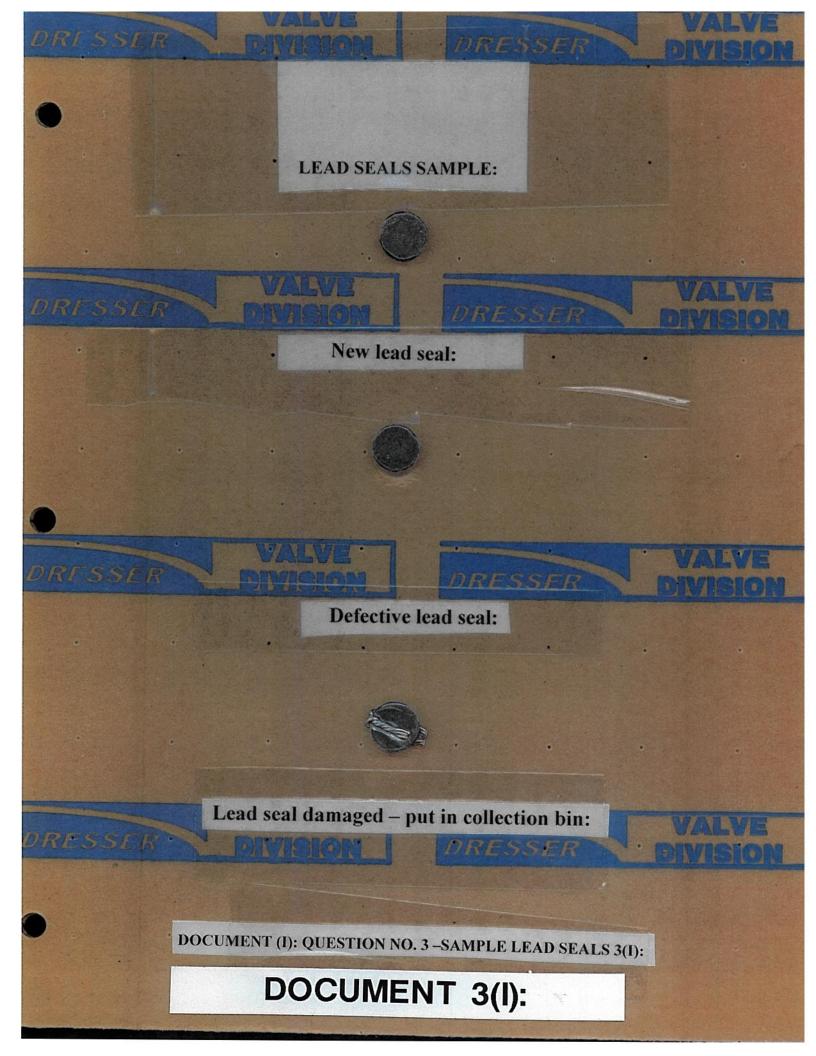
PHOTOGRAPH 3(H)

COMPLETED VALVE SEALED AFTER ALL TESTING AND ASSEMBLY IS COMPLETED READY TO SHIP TO CUSTOMER: SEALED WITH LEAD SEALS AND STAINLESS STEEL WIRE TO VERIFY ALL ASSEMBLY AND TESTING COMPLETED BEFORE SHIP TO CUSTOMER.

DOCUMENT: QUESTION NO. 3 – SEALED VALVE PHOTOGRAPH 3(H):

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DOCUMENT 3(H):



### CONFIRMATION LETTER

March 15, 1995

T. A. TURNER DRESSER INDUSTRIES HWY 167 N PO BOX 1430 ALEXANDRIA, LA 71309-1430

Re: Confirmation Number 4628305

Attention: T. A. TURNER

We are pleased to confirm CWM's approval of your waste material as described below. The attached profile for the waste materials was prepared by CWM based upon information provided by you. It is important that no changes be made to the profile without CWM's consent. If the profile meets with your approval, please call 1-800-843-3604 to schedule shipment of your waste materials.

CWM Profile Number:

A54350 LCH

Approved Mgmt. Facility:

CWM LAKE CHARLES

or another CWM or CWM approved facility

Waste Name:

HAZARDOUS WASTE SOLIDS, NOS

Disposal Method:

Stabilize & Landfill

Disposal Price:

\$285.00/Ton (Bulk Solid)

\$285.00/55 Gallon Drum (Solid)

Additional Fees:

Leaking Drums - \$200/Drum

Drums > 55 Gallons - 1.5 X Drum Price Above Drums requiring overpacking - \$100/Drum

Pallets - 4 X Drum Price Above

Jumbo bags, boxes, etc. - 1.5X Bulk Price Above Treatment Bulk Minimum - 10 X Bulk Rate Above

I caking Load - \$200.00/Load

Analytical cost to resolve discrepancy - Cost + 15% Certificate of Disposal (On request) - \$100/Cert Washout for non-CWM arranged load - \$100/Load Non-routine washout - \$250/Load min or Cost + 10% Louisiana Tax - \$40/Dry weight ton for hazardous waste or Generator's state tax, whichever is

greater.

Waste Approval Fees:

Not Applicable

**Pricing Conditions:** 

\* Note that disposal pricing is based on the

Haz wase Jacks - XC Me DV

Re: Confirmation Number 4628305

(cont.)

information from your profile. The actual invoice price is determined on the load received.

- \* Bulk solids pricing based upon a minimum density of 2,000 lbs per cubic yard. Measurement of waste material (including densities for the purpose of computing fees) shall be determined by Chemical Waste Management upon delivery to the disposal facility.
- \* Discrepant loads (receiving analytical is outside profile ranges) may be handled based upon site capabilities, however pricing must be negotiated prior to acceptance of significantly discrepant loads.
- \* If your company requires that a Purchase Order number or other identification number appear on the CWM invoice, the number must be noted in Section J of the manifest.

## Transportation Price:

- \$ 644.52 Priority Load
- \$ 25.00/Drum Shared Load Rate
- \$ 225.00/Pick-up Minimum Charge for Shared Load
- \$ 477.00/Month Container Rental
- \$ 191.00/Week Container Rental Minimum
- \* When requesting a container/roll-off delivery or set-in, a fee equal to the trip rate quoted above will be charged.
- \* If CWM arrives at the customer's facility for a scheduled pick-up and is not able to load, a charge equal to the trip rate will be assessed and another schedule date will need to be arranged.
- \* Non-conforming loads being rejected at the disposal facility will be charged a fee, equal to the trip rate, for returning the load.

### Demurrage:

\$83.00/Hour (After 1.0 Hour) at Generator's site \$60.00/Hour (After 1.0 Hour) at CWM disposal site \* CWM hauled loads held at the disposal facility due to customer manifest discrepancies and/or non-conforming wastes are subject to demurrage charges at the rate above.

Profile Expiration Date:

4/16/96

Special Conditions:

\* The first bulk load received for a waste that

Re: Confirmation Number 4628305

Special Conditions: (cont.)

requires stabilization will need to pass treatment standard testing prior to any other loads being scheduled.

- \* Discrepant loads (receiving analytical is outside profile ranges) may be handled based upon site capabilities, however pricing must be negotiated prior to acceptance of significantly discrepant loads.
- \* I ouisiana State Manifests should be used for all hazardous shipments. Manifests may be ordered through LADEQ at (504)765-0355.
- \* For all restricted hazardous waste, a Land Disposal Notification/Certification Form must be completed and accompany the manifest with each shipment.
- \* Drummed waste must be marked with the profile number on the top and sides of the containers and bear only the appropriate labeling under RCRA and/or DOT Provisions.
- \* If you have any questions regarding this Confirmation Letter, please contact Trudy Glackin at 800-843-3604 or 318-583-3771.

Applicable state and local taxes are not included in these disposal prices. All wastes are priced as profiled, invoiced as actually received. Invoices shall be paid no later than thirty (30) days from the date of receipt. All terms are governed by the Agreement previously executed between our companies. The prices quoted above are subject to change by CWM upon thirty (30) days' prior written notice to you unless otherwise specifically provided or per the terms of our Agreement. If we have not previously concluded a Service Agreement with your company, one is enclosed for your convenience. Please sign and return it to us as soon as possible. Also, if 'Signature on File' does not appear on the signature line of the Waste Profile Sheet, please sign and return it before scheduling your material.

If you have any questions or would like to make changes to the profile, please contact your representative. Thank you for this opportunity to be of service.

Chemical Waste Management, Inc.

Signature on original profile A54350 Signature

Profile # LCH A54350

WASTE PROFILE (\_) Check here if this is a Recertification LOCATION OF ORIGINAL CWM SOUTHERN REGION GENERAL INFORMATION 1. Conerator Name: DRESSER INDUSTRIES Generator USEPA ID: LADO71940233 2. \_\_\_\_\_rator Address: HWY 167 N \_\_\_\_\_ Billing Address: (X) Same PO BOX 1430 LA 71309-1430 3. Technical Contact/Phone: T. A. TURNER 318/640-6245 Billing Alternate 318/640-6190 Contact/Phone: B. J. McDONALD 318/640-6116 Contact/Phone: M. PETERS PROPERTIES AND COMPOSITION 5. Process Generating Maste: MASTE INCINERATOR ASHES FLOOR SWEEPINGS/OIL DRI. MISCELLANBOUS INDUSTRIAL SOLIDS 6. Waste Name: <u>HAZARDOUS WASTE SOLIDS</u>, NOS 7A. Is this a USEPA hazardous waste (40 CFR Part 261)? Yes (X) No (\_) B. Identify ALL USEPA listed and characteristic waste code numbers (D.F.K.P.U): DOOS State Waste Codes: 8. Physical State @ 70F: A. Solid(X) Liquid(\_) Both(\_) Gas(\_) B. Single Layer (X) Multilayer (\_) C. Free lig. range \_0 to \_0% 9A. pH: Range 4.0 to 10.0 or Not applicable (\_) B. Strong Odor (\_);describe \_\_ 10.Liquid Flash Point: < 73F (\_) 73-99F (\_) 100-139F (\_) 140-199F (\_) >= 200F (X) N.A. (\_) Closed Cup (X) Open Cup (\_) 11. CHEMICAL COMPOSITION: List ALL constituents (incl. halogenated organics) present in any concentration and forward analysis Constituents

Range Unit Description INCINERATOR ASHES 5 to 60 % 10 to MISCELLANEOUS IND. SOLID WASTE 45 % \_\_\_\_ 5 to TY PAINT CONTAINERS 15 % \_\_\_\_\_ 15 to WASTE FLOOR DRIER/SWEEPINGS 35 % MASTE PAINT SLUDGE 5 to 10 % 165,000000 TOTAL COMPOSITION (MUST BOUAL OR EXCEED 100%): 12. OTHER: PCBs if yes, concentration \_ \_\_\_\_ ppm, PCBs regulated by 40 CFR 761 (). Pyrophoric (\_) Explosive (\_) Radioactive (\_) Benzene if yes, concentration \_ \_\_\_\_ ppm, NESHAP (\_) Shock Sensitive (\_) Oxidizer (\_) Carcinogen (\_) Infectious (\_) Other \_\_\_\_\_ 13. If waste subject to the land ban & meets treatment standards, check here: \_ & supply analytical results where applicable. SHIPPING INFORMATION 14. PACKAGING: Bulk Solid (X) Bulk Liquid (\_) Drum (X) Type/Size: BULK\_\_\_ Other 15. ANTICIPATED ANNUAL YOLUMB: \_\_\_\_\_\_300 Units: CUBIC YARDS Shipping Frequency: MONTH SAMPLING INFORMATION 16a. Sample source (drum, lagoon, pond, tank, vat, etc.): Sample Tracking Number: 4628305 Date Sampled: \_\_\_\_\_ Sampler's Name/Company: \_\_\_\_\_ 16b. Generator's Agent Supervising Sampling: \_\_ 17. (X) No sample required (See instructions.) CENERATOR'S CERTIFICATION I hereby certify that all information submitted in this and all attached documents contains true and accurate descriptions of this waste. Any sample submitted is representative as defined in 40 CFR 261 - Appendix I or by using an equivalent method. All relation regarding known or suspected hazards in the possession of the generator has been disclosed. I authorize obtain a sample from any waste shipment for purposes of recertification.

Date

Name and Title

TERRY A. TURNER

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10.	111111	16 4	NUMBAR	LEVALEI.

		to any California	list	restrictions	enter the	letter	fron	below	(either	À,	B.1	or	B.2)	next	to
each restriction	that is	HOCs.	PCBs	. Acid.	Metals	. Cv	anid	es							

ntify ALL Characteristic and Listed USEPA hazardous waste numbers that apply (as defined by 40 CFR 261). For each waste per, identify the subcategory (as applicable, check none, or write in the description from 40 CFR 268.41, 268.42, and 268.43).

	A. US EPA HAZARDOUS	B. SUBCATEGORY Enter the subcategory descrip	B. SUBCATEGORY C. APPLICABLE TREATMENT THE SUBCATEGORY STANDARDS				
RKP	WASTE CODE(S)	Enter the subcategory descrip If not applicable, simply check none	PERFOR BAS Check as	MANCE- ED: applicable	SPECIFIED TECHNOLOGY: If applicable enter the 40 CFR 268.42 table 1 treatment code(s) 268,42	MANAGED? Enter letter from below	
	<u> </u>	DESCRIPTION	NONB	268.41(a)	268.43(a)	268,42	Ī
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Management under the land disposal restrictions: A. RESTRICTED WASTE REQUIRES TREATMENT

- B.1 RESTRICTED WASTE TREATED TO PERFORMANCE STANDARDS
- B.2 RESTRICTED WASTES FOR WHICH THE TREATMENT STANDARD IS EXPRESSED AS A SPECIFIED TECHNOLOGY (AND THE WASTE HAS BEEN TREATED BY THAT TECHNOLOGY)
- B.3 GOOD FAITH ANALYTICAL CERTIFICATION FOR INCINERATED ORGANICS
- C. RESTRICTED WASTE SUBJECT TO A VARIANCE
- D. RESTRICTED WASTE CAN BE LAND DISPOSED WITHOUT FURTHER TREATMENT
- MOST CURRENTLY SUBJECT TO LAND DISPOSAL RESTRICTIONS

B. NOT CONCENTED DODODOT TO	DANG DIGIOGRA REGI	KICIIONO		
21. Is this waste a soil or debr	is? No: _ Yes	, Soil: _	Yes, Debris: X	
22. Specific Gravity Range:	_ to			
23. Indicate the range of each:		Units		
Cyanides: _ None	to		Type (free, total, amenable, etc.	)
Cyanides: _ None	to		Type (free, total, amenable, etc.	)
Sulfides: _ None	to		Туре	
ionalenolics: _ None	to		(M)	
24 Identify the waste color CPA	₩.	D	Of physical state Solid	

and physical appearance NAILS, ASH, PAPER, RUBBER, METALS

25. COMPLETE ONLY POR WASTES INTENDED FOR PUELS OR INCINERATION	26. RECLAMATION, FUELS OF INCINERATION PARAMETERS (Provide if information is available)
TOTAL	RANGE
llium as Be	ppm A. Heat Value (Btu/lb):
Potassium as K	ppm B. Water:
Sodium as Na	ppm C. Viscosity (cps): P F 100 F 150 F
Bromine as Br	Z D. Ash: Z
Chlorine as Cl	% B. Settleable solids: %
Fluorine as F	% F. Vapor Pressure @ STP (mm/Hg):
Sulfur as S	C. Is this waste a pumpable liquid? Yes _ No _
	H. Can this waste be heated to improve flow? Yes _ No _
!	I. Is this waste soluble in water? Yes _ No _
	J. Particle size: Will the solid portion of this waste pass through a 1/8 inch screen? Yes _ No _
27. TRANSPORTATION INFORMATION	· · · · · · · · · · · · · · · · · · ·
A. Is this a DOT Hazardous Material? Yes X No _	
B. Proper Shipping Name : HAZARDOUS N	WASTE SOLID. N.O.S.
and Additional Description if required: RO (DOOS)	
-	
OT Regulations: North America Hazard Class: 9	Misc. Hazardous Mater I.D. NA3077 Packing Group: III
D. CERCLA Reportable Quantity (RQ) and units (Lb, Kg):	:1 Lb
B. Non-Bulk code Bulk code	
F. Special Provisions	
G. Labels Required	
28. SPECIAL HANDLING INFORMATION	
_ Material Safety Data Sheets Attached	
29. OTHER INFORMATION	
NO FREE LIQUIDS	
30 MICAL WASTE MANAGEMENT CERTIFICATION	

Chemical Waste Management, Inc. has all the necessary permits and licenses for the waste that has been characterized and identified by this approved profile.

31. OTHER HAZARDOUS CONSTITUENTS Indicate if the waste contains any of the following.

METALS	Check o	TCLP Informa only ONB for ea Use units: po	ch cons		TCLP Data			e units	or perc	ng/l, ng/kg
	Less Than	TC Regulated Level	Equal or More	Waste No.	TCLP Actual		Regu	lated	t  Bgual   or  More	Actual
Arsenic as As	Х_	5.0 mg/l		D004			500	nq/l		
Barium as Ba	X	100,0 mg/1	<u> </u>	D005						
Cadmium as Cd	_ X	1,0 mg/1		D006			100	mq/1		
Chromium tot Cr	_X	5.0 mg/1	ļ	D007						
Lead as Pb	<u> </u>	5,0 mg/1	X	D008			500	mg/l		
Mercury as Ho	<u> </u>	.2 mg/1		D009			20	nq/l		
Selenium as Se	<u> </u>	1.0 mg/l	<u> </u>	D010			100	mq/l		
Silver as Aq	X	5.0 mg/1		D011						
Nickel as Ni	<u> </u>	ļ	<u> </u>			_	134	mq/l		
Thallium as Tl	ļ	<u> </u>	ļ			_ _	130	mq/1		
Chronium Hex		ļ					500	mq/1		
Antimony		<u> </u>	-			_				
Beryllium		ļ	-						ļ.,	
Copper		<del> </del>		<del>                                     </del>		-	-			
Yanadium	ļ	<del> </del>	-	<u> </u>		-				
Zira		<del> </del>		<del>                                     </del>		_			<del>                                     </del>	<u></u>
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32. OTHER HAZARDOUS CONSTITUENTS Indicate if the waste contains any of the following.

GANICS	Check o	TCLP Informa nly OMB for e	tion: ach com	stituent	TCLP Data	! TCA or TOTAL !Use units: ppm, mg/l or
	Less Than	Regulated Leyel	Equal	Waste No.	TCLP Analytical Test Results Use units: ppm or mg/l	
Benzene	X	0.5 mg/l		D018		
Carbon Tetrachloride	X	0.5 mg/l		D019		
Chlordane	X	0,03 mg/l		D020		
Chlorobenzene	<u> </u>	100,0 mq/1		D021		<u> </u>
Chloroform	X	6,0 mq/l		D022		
m-Cresol	<u> </u>	200 mg/l		D024		
o-Cresol	<u> </u>	200,0 mg/l		D023		
p-Cresol	X	200.0 mg/l		D025		
Cresol	X	200.0 mg/l		D026		
2.4-D	X	10,0 mq/1		D016		
1.4 Dichlorobenzene	X	7.5 mg/l	1	D027		
1.2-Dichloroethane	X	0.5 mg/l		D028		
1.1-Dichloroethylene	<u> </u>	0.7 mg/l		D029		
2.4-Dinitrotoluene	X	0.13 mg/l		D030		ļ
Endrin	X	.02 mg/l		D012		<u> </u>
Heptachlor, & Hydroxide	X	0,008 mq/l	$\vdash \vdash$	D031		<u> </u>
exachloro-1.3 Butadiene	<u> </u>	0.5 mg/l	$\vdash$	D033		<u> </u>
dexachlorobenzene	X	0.13 mg/l	<del>                                     </del>	D032		ļ
Hexachloroethane	X	3,0 mg/l		D034		ļ
Lindane	<u>  x                                   </u>	0.4 mg/l		D013		
Methoxychlor	<u> </u>	10.0 mg/l	$\vdash \vdash$	D014		
Methyl Ethyl Ketone	<u>  x </u>	200,0 mg/l		D035		<u> </u>
Nitrobenzene	<u>  x </u>	2.0 mg/l		D036		<u> </u>
Pentachlorophenol	<u> </u>	100,0 mg/1		D037		ļ
Pyridine	X	5,0 mg/l		D038		
Tetrachloroethylene	<u> </u>	0.7 mg/l		D039		
Toxaphene	X	0.5 mg/l		D015		
2.4.5-TP Silvex	X	1.0 mg/l		D017		
Trichloroethylene	X	0.5 mg/l		DO40		
2.4.5-Trichlorophenol	Х	400,0 mg/l		DO41		1
2.4.6-Trichlorophenol	X	2.0 mg/l		DO42		
Vinyl Chloride	<u> </u>	0,2 mg/1		D043		

## LAKE CHARLES TREATMENT CENTER LAND DISPOSAL NOTIFICATION AND CERTIFICATION FORM CUT

	150
ICH-A543	1

		unno ore	STOOM NOTIFICATION AND CENTIFICATION FORM (013)		14.11-154350
Gene	erator Name:	DRESSER INDUSTRIES	Manifest Doc. No.:		
CHM	Profile Number	: <u>A54350</u> DEBRIS	State Manifest No:		
2:		non-wastewater or wast subject to any Califo	tewater? (See 40 CFR 268.2 and LAC33: V.2203) Check One: ornia List restrictions enter the letter from below (either		
3. Id	Tentify ALL USE aste code, iden and California L cose constituen aracteristic and attached.	PA hazardous waste contify the corresponding ist treatment standard ts must be listed and meet 268.48 standard	als, Cyanides  des that apply to this waste shipment, as defined by 40 CF  g subcategory, or check NONE if the waste code has no subc  ds are listed on the following page. If PO39, multi-sour  attached by the generator. If DOO1, DOO2, or DO12-DO43 re  rds, then the underlying hazardous constituent(s) present	R 261 and category ce applie guires tr in the wa	LAC33:Y.Chapter 49. Spent solvent seatment of the ste must be listed
rkf	4. US EPA HAZARDOUS MASTES		5. SUBCATEGORY  ENTER THE SUBCATEGORY DESCRIPTION.  IF NOT APPLICABLE, SIMPLY CHECK NOWE		6. HOM MUST THE WASTE BE MANAGED? ENTER LETTER
*	CODE(S)		DESCRIPTION	NONB	FROM BELOW
1				Х.	Α
_2					
_3 _4				+	
5				$\top$	
To Con	identify F039 stituent Form	or D001, D002, D012-D0 proyided (CMM2004) ar	043, underlying hazardous constituent(s), use the "P039/Un nd check here:	derlying	Hazardous
To	no unus are pr list additiona check here:	esent in the waste upon USEPA waste code(s)	on its initial generation check here: X and subcategorie(s), use the supplemental sheet provided	(CWM-LC-2	005-B)
B.2 RTRATE Affine R.3 Grani h. L. W. B.3 Grani h. L	priate certification was to must a safe mu	cation as provided be a REQUIRES TREATMENT be treated to the app Section 3004(d) and I bris: "This hazardous B TREATED TO PERFORMAN I penalty of law that eatment process used to possible for obtaining and so as to comply we 22, Subchapter B and a seible dilution of proceeding the possible dilution of proceeding the possible SFOR WHICH THE TREATMOLOGY) I penalty of the law that the treatment process diately responsible fed by incineration in 31 or LAC33:V.Capter technical requirement good faith efforts the treatment process of prohibition in colustical prohib	ACCASIVE 2213 and LACCASIVE Chapter 22, Subchapter B.  ACCASIVE 2213 and LACCASIVE Chapter 22, Subchapter B.  debris is subject to the alternative treatment standards  ACCESTANDARDS  I have personally examined and an familiar with the treat  to support this certification and that, based upon my ingu  g this information. I believe that the treatment process  with the performance levels specified in 40 CFR Part 268 S  all applicable prohibitions set forth in 40 CFR 268.32 or  obibited waste. I am aware that there are significant pen  ility of a fine and imprisonment."  THEMIT STANDARD IS EXPRESSED AS A SPECIFIED TECHNOLOGY (AND  that the waste has been treated in accordance with the req  e Louisiana Hazardous Waste Regulations. I am aware that t  including the possibility of fine and imprisonment."  FOR INCINERATED ORGANICS  I have personally examined and an familiar with the treat  susued to support this certification and that, based upon  for obtaining this information, I believe that the nonwast  units operated in accordance with 40 CFR Part 264 Subpart  of 43, Subchapter N, or by combustion in fuel substitution us  to analyze for such constituents. I am aware that there ar  cluding the possibility of fine and imprisonment."	Subpart D of 40 CFR ment tech iry of th has been ubpart D RCRA Sect alties fo THE WAST uirements here are ment tech my inqui ewater or O or 265 nits oper anic cons e signifi ase exten R Part 26 LAC33:V. ment stan named abo through ith the t ibitions	Part 268.45."  mology and operose individuals operated and ion 3004(d) r submitting a false B HAS BEEN of significant penaltie mology ry of those ganic constituents 265 Subpart 0 and ating accordance tituents despite cant penalties for sion. Enter the 8 Subpart D 2213 dards ye. analysis and testing reatment standards set forth in
I ber best	eby certify the	2 33: V,2247C omits the it all information sub and information.	word "Impermissible" while 40 CFR Part 268,7(b)(5) uses a mnitted in this and all associated documents is complete a	same. nd accura	te, to the
			Title Date te Management , Inc 12/94 - Form CMM-LC-2005-A		

If the waste identified on the first page of this form is described by any of the following USKPA hazardous waste codes: FOO1, FOO2, FOO3, FOO4, FOO5, and all solvent constituents will not be monitored by the treater, and/or this hazardous waste is subject to any prohibitions identified as California List restrictions (40 CFR 268.32 and/or RCRA Section 3004(d)), then each constituent MUST be identified below by checking the appropriate box, and this page must accompany the shipment, along with the previous page of this form. If the waste code FOO39 describes this waste, then the corresponding list of constituents must be attached. If DOO1, DOO2, or DO12-DO43 require treatment to 268.48 standards, then the underlying barries constituent(s) must also be attached.

SOLVENT WASTE TREATMENT STANDARDS

FOOI through FOO5 spent solvent constituents and their associated USEPA hazardous waste code(s).

SOLVENT WASTE TREATMENT STANDARDS

| POOI through FOO5 spent solvent constituents and their associated USEPA hazardous waste code(s).

| Treatment Standard | Treatment Standard | Treatment Standard | Wastewaters | Nonwastewaters | Wastewaters | Nonwastewaters | Wastewaters | Nonwastewaters | Wastewaters | Nonwastewaters | Wastewaters | Wastewa

All spent solvent treatment standards are measured through a total waste analysis (TCA), unless otherwise noted. Wastewater units are mg/l, nowastewater are mg/kg.

CALIFORNIA LIST TREATMENT STAN A waste must first be designated as a U restrictions. Restricted waste description	DARDS40CFR 268.32,40 CFR 268.42 and RCRA S RPA Hazardous waste before the waste car	A Section 3004(d) n be subject to the California List
Restricted waste description	Prohibition	Treatment Standard
Halogenated Organic Compounds listed in 40 CFR 268, Appendix III	Liquid* wastes: Greater than or equal   to 1,000 mg/l   Monliquid wastes: Greater than or equal   to 1.000 mg/kg	Treatment Standard 40 CFR 268.42(a)(2) - INCIN or FSUBS
Liquid wastes containing Poly Chlorinated Bipbenyls (PCBs)	Greater than or equal to 50 ppm	40CFR 268.42(a)(1) - INCIN or FSUBS Also see 40 CFR 761.60 and .70
Liquid* wastes containing Metals  Note: Hazardous wastes containing As, Cd, Cr, Hg, Pb, or Se must be evaluated if not characteristically hazardous for that metal	One or more of the following metals (or elements) at concentrations greater than or equal to the following: Nickel and/or compounds as Ni: 134ng/l Thalium and/or compounds as Th: 130ng/l	Also see 40 CFR 761.60 and 70 RCRA Section 3004(d)

\* - For the definition "liquid" refer to Method 9095, the Paint Filter Liquids Test from EPA manual SW-846 SUBCATEGORY REFERENCE

A. Ignitable characteristic wastes, except for the 40 CFR 261.21(a)(1) High TOC subcategory, that are managed in non-CWA/non-CWA equivalent/non-Class I SDWA systems.

B. Ignitable characteristic wastes, except for the 40 CFR 261.21(a)(1) High TOC subcategory, that are managed in CWA/CWA-equival or Class I SDWA systems.

C. High TOC Ignitable characteristic liquids subcategory based on 40 CFR 261.21(a)(1) - Greater than or equal to 10% total carbon.

D. Corrosive characteristic wastes that are managed in non-CWA/non-CWA-equivalent/non-Class I SDWA systems.

E. Corrosive characteristic wastes that are managed in CWA, CWA-equivalent, or Class I SWDA systems.

1990 Chemical Maste Management , Inc. - 12/94 - Form CWM-LC2005-A

**(3)** 

**Dresser IVO** PO Box 1430 Alexandria, La. 71309-1430

**Plant Engineering Department** (318)640-6245 Phone (318)640-6322 Fax

Date: Jan. 13, 99

Omega One Inc. 1515 England Drive Alexandria, La. 71303-4109 Fax (318)442-9704 V

Attn. Bob Beall, Operations Manager

Re: Plant trash Incinerator Ashes

Bob as per our review last week, we are requesting that the subject incinerator ashes be set up With Omega One's open top 35 CY trash Dumpster and these are not hazardous waste. The ashes Are generated from the incineration of plant trash (boxes, paper, wood, vending machine area, trash And normal plant operations) - No hazardous waste or bio-medical waste is incinerated.

As requested we are furnishing an attached TCLP ran per EPA, La DEQ approved methods And the incinerator ashes are non-hazardous by this test. (Copy Attached): TCLP ran for EPA Toxic, Corrosivity, Reactive, and Ignitable. Please review and get back to me at your earliest convenience with an Approval to ship out with the 35 CY non-hazardous plant trash container and the method of loading That would be best for both Dresser and Omega One, we currently have 4 - 2 CY self dumping Hoppers that are ready to load.

Also please advise which disposal site would be used and site LaDEQ approval ID and That it is permitted for industrial solid waste.

Terry Turner

Attached SPL --- TCLP Analysis of Plant Trash incinerator Ashes:

CC: Curtis Hensley, Dresser IVO Lenny Humphreys, Dresser IVO

Dong Sum

Solid Wasti Portfili

DOCUMENT 3(K):

## Section #3

### **Section 3:**

### Questions 4 & 5;

4. Provide copies of all sampling results for the ash from the incinerator.

Listed below are the documents and the descriptions of each with its document no.'s listed:

Document 4 (A) – Toxic Characteristic Leachate Procedure (TCLP) Metals only for incinerator ashes from CA 1364 plant trash incinerator 18 PPM lead results: (1 document)

Document 4(B) – TCLP sampling of the incinerator ashes after the segregation of lead seals from the plant trash waste stream. March 1993 to Feb 1994: --- (33 documents) confirming level of lead below 5 PPM non-hazardous. This is all the documentation that we find record of and still had copies from 2/16/93 to 4/6/94, we have lost some of the sampling data: If any more is found will gladly forward it on as an attachment to this informational inquiry.

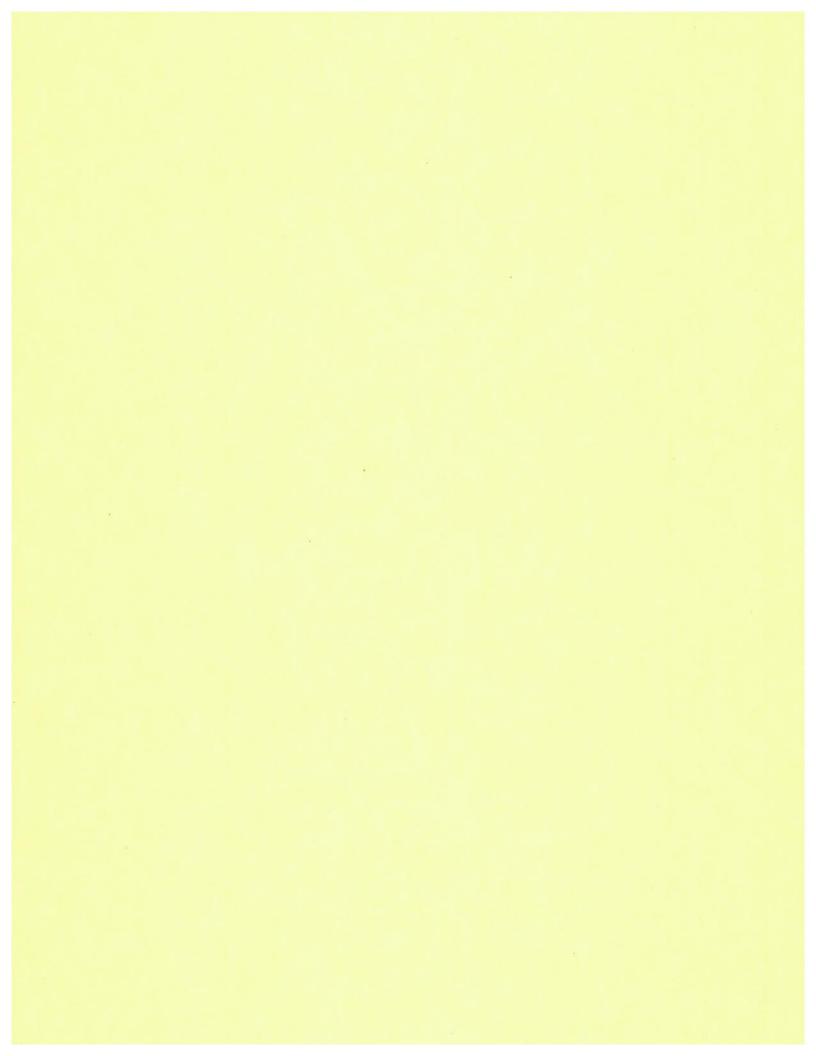
Document 4(C) – Full TCLP testing of the incinerator ashes after the segregation of lead seals from the plant trash waste stream for all characteristic waste types. Ignitable, Toxicity, Reactivity, and Corosivity as listed in 1993 no hazardous characteristics found.

5. Provide copies of all the hazardous waste manifests for incinerator ash for the last three years.

Manifest No. LAA 6662139 Document 5(A) Manifest No. LAA 6663250 Document 5(B)

Answered by: Terry A Turner

Consulted with: N. Mayeaux, Earl Wenzel:



# SwL

## **SOUTHWESTERN LABORATORIES**

Materials, environmental and geotechnical engineering, nondestructive, metallurgical and analytical services
222 CAVALCADE \* P.O. BOX 8768, HOUSTON, TEXAS 77249 \* 713 692-9151

Client No. 2\_1928\_00
P. O. BOX 1430
Report No. 90-09-324
ALEXANDRIA, LOUISIANA 71309
318/640-6185
Attn: RON GRUENER

Project WASTE SOLIDS ANALYSIS

Date Sampled 09/24/90

Sampled By CLIENT

 Sample Type SOLID SAMPLE
 Transported by UPS

 P.O. # 155072-6
 Date Received 09/25/90

 Lab No.
 Sample Identification

 90-09-324-01
 COMPOSITE OF SAMPLES 1-4

SOUTHWESTERN LABORATORIES

MARK TIPTON

DOCUMENT 4(A) - TCLP - D008 LOW LEVEL LEAD - 18 PPM

XC MA

## SOUTHWESTERN LABORATORIES

Client:

Dresser Industries

File No.: 2-1928-00

Report No.: 90-09-324

Report Date: 10/30/90

Sample I. D.: Composite of Samples 1-4

## **TCLP METALS**

<u>Contaminant</u>	Measured <pre>Concentration, mg/l</pre>	Maximum Allowable Concentration, mg/l
Arsenic	<0.50	5.0
Barium	0.78	100.0
Cadmium	0.11	1.0
Chromium	0.26	5.0
Lead	18.8	5.0
Mercury	<0.020	0.2
Selenium	<0.50	1.0
Silver	<0.05	5.0

### **SOUTHWESTERN LABORATORIES**

Client:

Dresser Industries

File No.: 2-1928-00

Report No.: 90-09-324

Report Date: 10/30/90

## **IGNITABILITY**

<u>Parameters</u>

Flashpoint (closed cup)

Results, °F

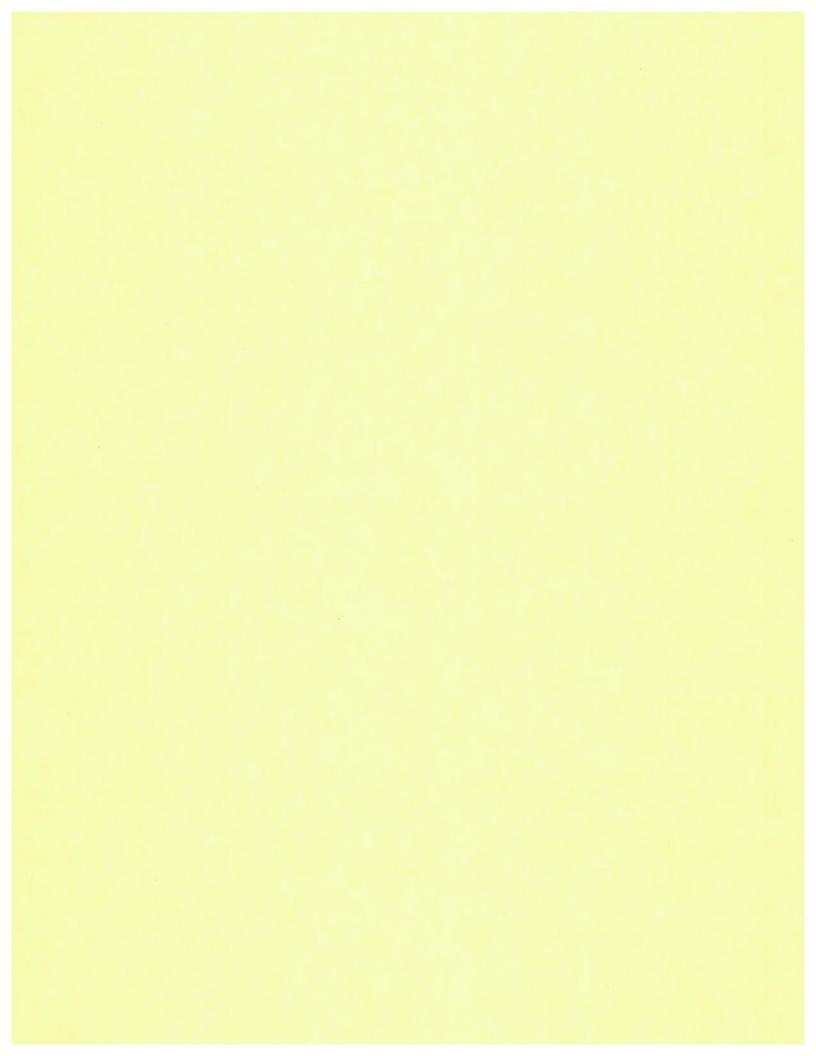
>200

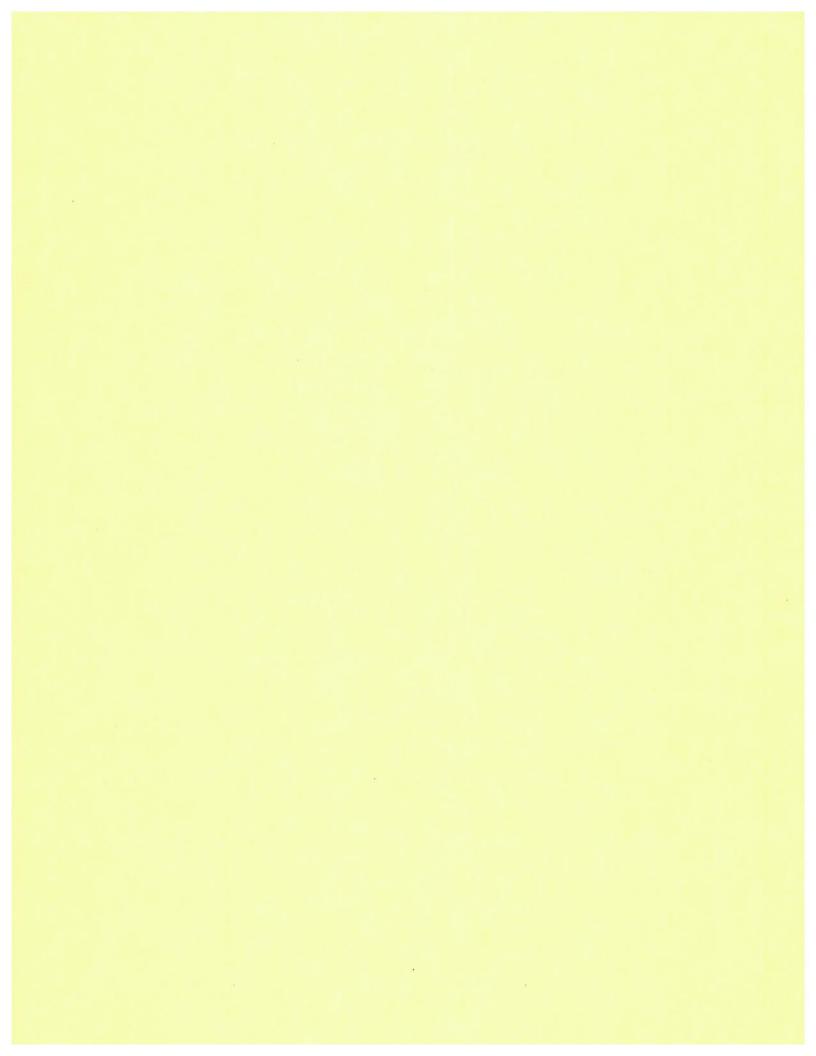
Minimum Allowable

140°F

## REACTIVITY

<u>Parameters</u>			Results	EPA Action Level		
	Hydrogen sulfide,	ppm	26		500	
1	Hydrocyanic Acid,	maa	<0.400		250	







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Client

DRESSER INDUSTRIES

P. O. BOX 1430

ALEXANDRIA, LA 71309-1430 318/640-6185 FAX 640-6175

Attn: TERRY TURNER

Project CHEMICAL ANALYSIS-MSO 118338 AShes

Date Sampled 02/15/93

Sample Type SOLID SAMPLES

P.O. # 165560-6

Lab No.

93-02-213-01

93-02-213-02

Sampled By CLIENT

Transported by <u>DELIVERY SERVICE</u>

Date Received 02/16/93

Sample Identification

C/A 1364 NO.7 /

C/A 1364 NO.8 ~

SOUTHWESTERN LABORATORIES

Client No. 2\_1928\_00

Report No. 93-02-213

Report Date 02/26/93 08:45

Reviewed By

UECTOD CORONICO

**DOCUMENT 4(B): 1 OF 31** 

Order, # 93-02-213 02/26/93 08:45

Client: DRESSER INDUSTRIES

TEST RESULTS BY SAMPLE

Sample: 01A C/A 1364 NO.7

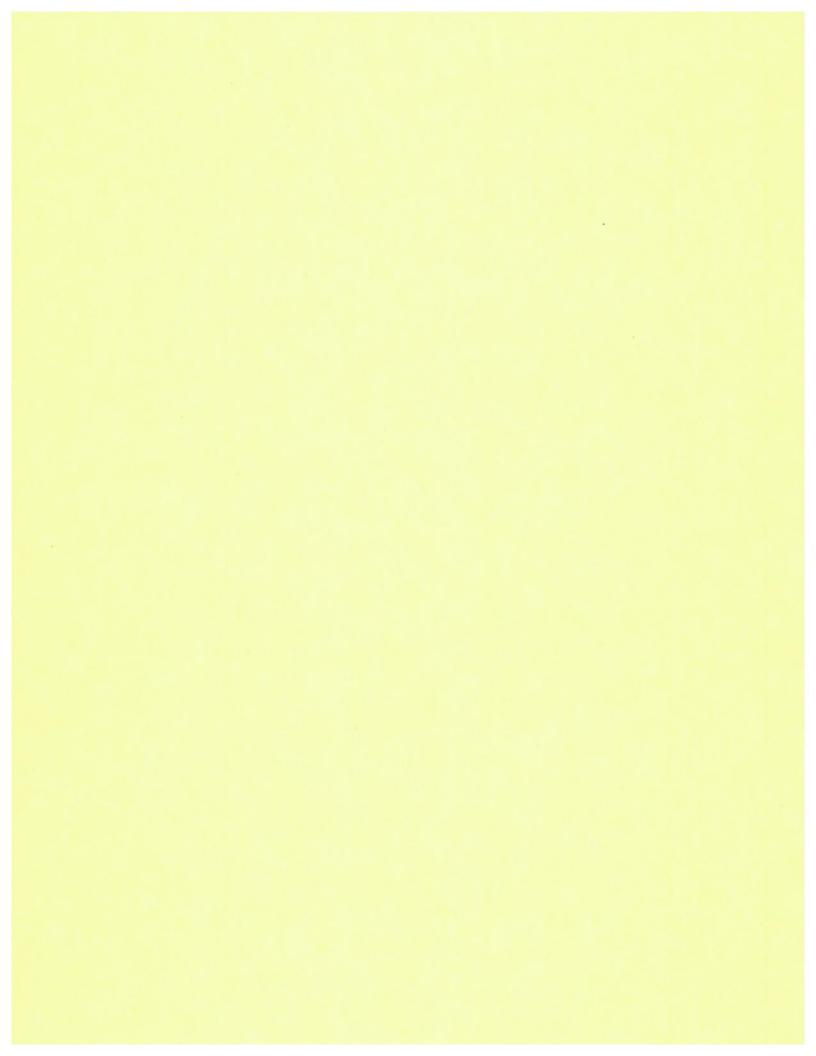
Collected: 02/15/93 06:00

Test Name TCLP METALS	Method EPA_SW846	<u>Result</u>	<u>Units</u>	<u>Detectio</u> <u>Limit</u> Regulato	Started	<u>Analyst</u>
Arsenic	EPA_SW846	<0.50	MG/L	Limit 5.0	02/25/93	JP
Barium	EPA_SW846	1.05	MG/L	100	02/24/93	JP
Cadmium	EPA_SW846	<0.01	MG/L	1.0	02/24/93	JP
Chromium	EPA_SW846	<0.05	MG/L	5.0	02/24/93	JP
Lead	EPA_SW846	<0.50	MG/L	5.0	02/24/93	JP
Mercury	EPA_SW846	<0.008	MG/L	0.20	02/25/93	JA
Selenium	EPA_SW846	<0.50	MG/L	1.0	02/25/93	JA
Silver	EPA_SW846	<0.50	MG/L	5.0	02/25/93	JP
TCLP PREP.	SW-846 1311	02/18/93	DATE		02/19/93	JGH

Sample: 02A C/A 1364 NO.8

Collected: 02/15/93 06:00

Test Name TCLP METALS	<u>Method</u> EPA_SW846	Result	Units	Detectio Limit Regulato	Started	<u>Analyst</u>
Arsenic	EPA SW846	±0. F0	HC (1	Limit		6000
Barium	EPA_SW846	<0.50 1.74	MG/L MG/L	5.0 100	02/25/93	JP
Cadmium	EPA_SW846	<0.01	MG/L	1.0	02/24/93	JP JP
Chromium	EPA_SW846	<0.05	MG/L	5.0	02/24/93	JP
Lead	EPA_SW846	<0.50	MG/L	5.0	02/24/93	JP
Mercury Selenium	EPA_SW846	<0.008	MG/L	0.20	02/25/93	JA
Silver	EPA_SW846 EPA_SW846	< 0.50	MG/L	1.0	02/25/93	JP
TCLP PREP.	SW-846 1311	<0.05 02/18/93	MG/L DATE	5.0	02/25/93 02/19/93	JA JGH



### SWL

### SOUTHWESTERN LABORATORIES

Materials, environmental and geotechnical engineering, nondestructive, metallurgical and analytical services 222 CAVALCADE \* P.O. BOX 8768, HOUSTON, TEXAS 77249 \* 713 692-9151

Client DRESSER INDUSTRIES

P. O. BOX 1430

ALEXANDRIA, LA 71309-1430 318/640-6245 FAX 640-6322

Attn: TERRY TURNER

Client No. 2\_1928\_00 Report No. 93-03-040 Report Date 03/12/93 13:16

Project CHEMICAL ANALYSIS-MSO 118338 As he's

Date Sampled <u>03/01/93</u>

Sample Type SOLID SAMPLES

P.O. # 165560-6

Lab No. 93-03-040-01 93-03-040-02 Sampled By CLIENT

Transported by <u>DELIVERY SERVICE</u>

Date Received 03/02/93

Sample Identification

C/A 1364 NO.9 -

C/A 1364 NO.10 -

SOUTHWESTERN LABORATORIES

Reviewed By

HECTOR CORONADO

Document 4 (B): SWLabs Jury (2) Jelps Metals and \$11/93

#### TEST RESULTS BY SAMPLE

Order # 93-03-040 03/10/93 16:01

Client: DRESSER INDUSTRIES

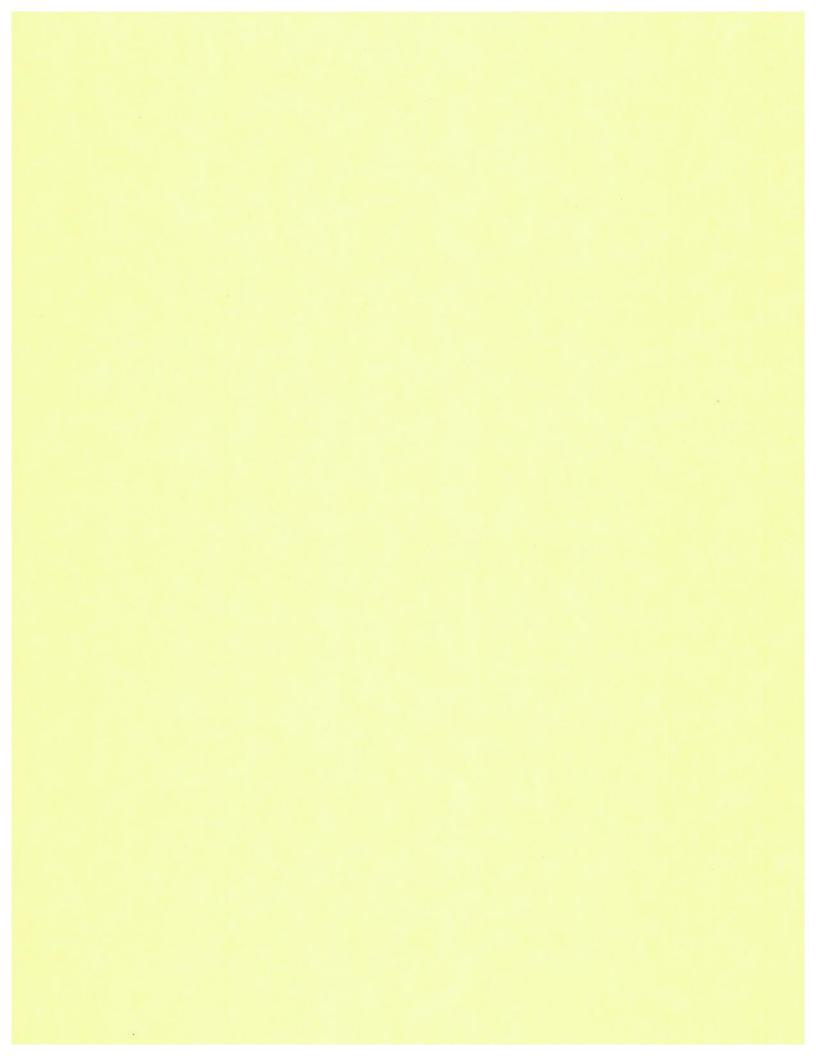
Sample: 01A C/A 1364 NO.9

Collected: 03/01/93 06:00

Test Name TCLP METALS	Method EPA_SW846	Result	<u>Units</u>	<u>Detectio</u> <u>Limit</u> Regulato	Started	<u>Analyst</u>
Arsenic	EPA_SW846	0.66	MG/L	Limit 5.0	03/10/93	GLM
Barium Cadmium	EPA_SW846	0.78	MG/L	100	03/10/93	GLM
Chromium	EPA_SW846 EPA_SW846	<0.01 0.69	MG/L MG/L	1.0	03/10/93	GLM
Lead 	EPA_SW846	<0.50	MG/L	5.0 5.0	03/10/93	GLM GLM
Mercury Selenium	EPA_SW846 EPA_SW846	<0.008	MG/L	0.20	03/05/93	JA
Silver	EPA_SW846	<0.50 <0.05	MG/L MG/L	1.0 5.0	03/10/93 03/09/93	GLM JA
TCLP PREP.	SW-846 1311	03/03/93	DATE	5.0	03/04/93	JH

Sample: 02A C/A 1364 NO.10 Collected: 03/01/93 06:00

Test Name TCLP METALS	<u>Method</u> EPA_SW846	Result	<u>Units</u>	<u>Detectio</u> <u>Limit</u> Regulato	Started	Analyst
Arsenic	EPA_SW846	-0.50	WC /:	Limit		
Barium		<0.50	MG/L	5.0	03/10/93	GLM
Cadmium	EPA_SW846	0.66	MG/L	100	03/10/93	GLM
C1-0000 00000	EPA_SW846	< 0.01	MG/L	1.0	03/10/93	GLM
Chromium	EPA_SW846	0.76	MG/L		03/10/93	GLM
Lead	EPA_SW846	<0.50	MG/L			37.00
Mercury	EPA SW846		1.400 (3.40) (34)		03/10/93	GLM
Selenium		<0.008	MG/L	0.20	03/05/93	JA
	EPA_SW846	<0.50	MG/L	1.0	03/10/93	GLM
Silver	EPA_SW846	< 0.05	MG/L	5.0	03/09/93	JA
TCLP PREP.	SW-846 1311	03/03/93	DATE	02707.0	03/04/93	JH





### SOUTHWESTERN LABORATORIES

Materials, environmental and geotechnical engineering, nondestructive, metallurgical and analytical services
222 CAVALCADE \* P.O. BOX 8768, HOUSTON, TEXAS 77249 \* 713 692-9151

Client DRESSER INDUSTRIES

P. O. BOX 1430

ALEXANDRIA, LA 71309-1430 318/640-6245 FAX 640-6322

Attn: TERRY TURNER

Client No. 2\_1928\_00 Report No. 93-03-246 Report Date 03/30/93 15:52

Project MSO-118645/CHEMICAL ANALYSIS AS hes

Date Sampled <u>03/08/93</u>

Sample Type SOLID SAMPLES

P.O. # <u>167044-6</u>

<u>Lab No.</u> 93-03-246-01 93-03-246-02 Sampled By CLIENT

Transported by <u>DELIVERY SERVICE</u>

Date Received 03/16/93

Sample Identification

CA 1364 NO. 11

CA 1364 NO. 12 •

SOUTHWESTERN LABORATORIES

Reviewed By

HECTOR CORONADO

VA (FA)

**DOCUMENT 4(B): 3 OF 31** 

Order # 93-03-246 03/30/93 15:52

TEST RESULTS BY SAMPLE

Client: DRESSER INDUSTRIES

Sample: 01A CA 1364 NO. 11

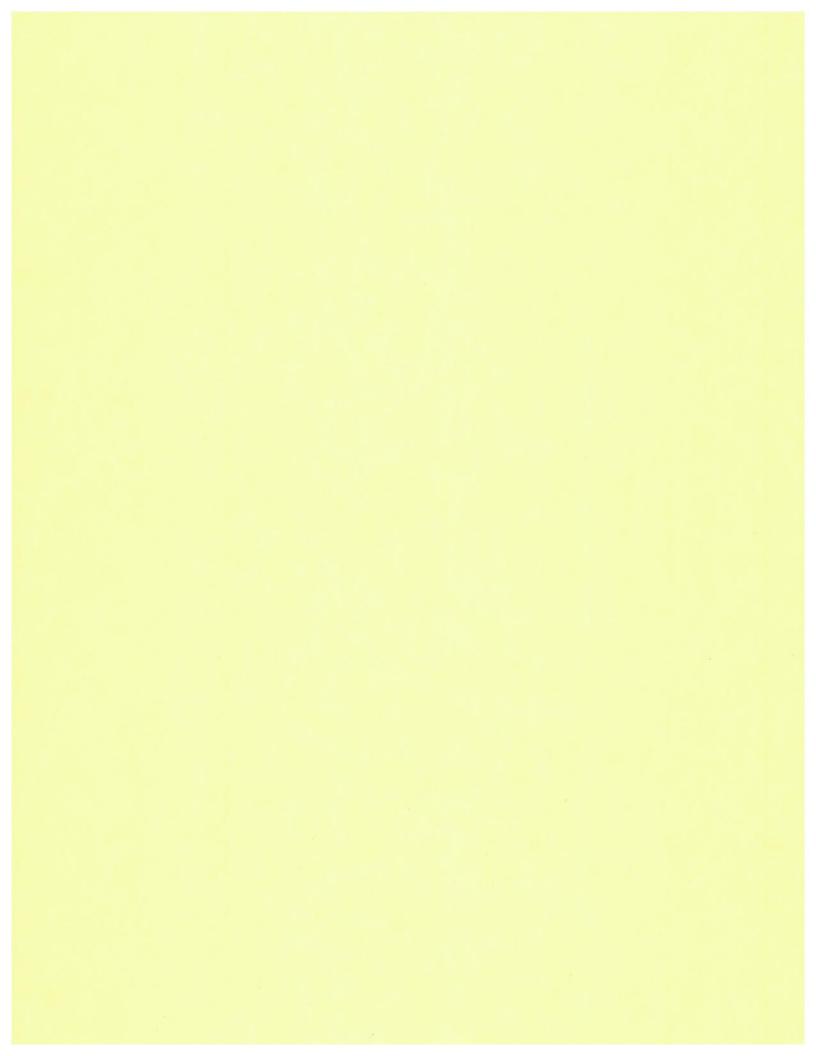
Collected: 03/08/93 06:00

Test Name				<u>Detection</u> <u>Date</u>		
TCLP METALS	Method	<u>Result</u>	Units	<u>Limit</u>	Started	Analyst
ICLP METALS	EPA_SW846			Regulato	ry	
A				Limit		
Arsenic	EPA_SW846	< 0.50	MG/L	5.0	03/30/93	JP
Barium	EPA_SW846	0.97	MG/L	100	03/28/93	JP
Cadmium	EPA_SW846	< 0.01	MG/L	1.0	03/28/93	JP
Chromium	EPA_SW846	<0.05	MG/L	5.0	03/28/93	JP
Lead	EPA SW846	<0.50	MG/L	5.0	03/28/93	
Mercury	EPA SW846	<0.008	MG/L	1707.370		JP
Selenium	100 TO 10		S200 * S200	0.20	03/25/93	JA
Silver	EPA_SW846	<0.50	MG/L	1.0	03/30/93	JP
	EPA_SW846	<0.05	MG/L	5.0	03/23/93	JA
TCLP PREP.	SW-846 1311	03/20/93	DATE		03/21/93	JGH

Sample: 02A CA 1364 NO. 12

Collected: 03/08/93 06:00

Test Name TCLP METALS	<u>Method</u> EPA_SW846	Result	Units	<u>Detectio</u> <u>Limit</u> Regulato	Started	<u>Analyst</u>
Arsenic	EPA_SW846	<0.50	MG/L	Limit 5.0	03/30/93	10
Barium	EPA_SW846	0.72	MG/L	100	03/30/93	JP JP
Cadmium	EPA_SW846	<0.01	MG/L	1.0	03/28/93	JP
Chromium	EPA_SW846	<0.05	MG/L	5.0	03/28/93	JP
Lead	EPA_SW846	<0.50	MG/L	5.0	03/28/93	JP
Mercury	EPA_SW846	<0.008	MG/L	1000-000	03/23/93	JA
Selenium	EPA_SW846	<0.50	MG/L		03/30/93	JP
Silver	EPA_SW846	<0.05	MG/L	5.0	03/23/93	JA
TCLP PREP.	SW-846 1311	03/20/93	DATE		03/21/93	JGH





# SwL

### SOUTHWESTERN LABORATORIES

Materials, environmental and geotechnical engineering, nondestructive, metallurgical and analytical services 222 CAVALCADE \* P.O. BOX 8768, HOUSTON, TEXAS 77249 \* 713 692-9151

Client DRESSER INDUSTRIES

P. O. BOX 1430

ALEXANDRIA, LA 71309-1430 318/640-6245 FAX 640-6322

Attn: TERRY TURNER

Client No. 2\_1928\_00 Report No. 93-03-256 Report Date 03/30/93 15:53

coursed

Project TCLP ANALYSIS-MSO 118645 Adves

Date Sampled <u>03/15/93</u>

Sample Type SOLID SAMPLES

P.O. # 167044-6

Sampled By CLIENT

Transported by <u>DELIVERY SERVICE</u>

Date Received 03/16/93

Lab No.

93-03-256-01

93-03-256-02

Sample Identification

C/A 1364 NO. 13

C/A 1364 NO. 14

SOUTHWESTERN LABORATORIES

Reviewed By

HECTOR CORONADO

**DOCUMENT 4(B): 4 OF 31** 

Order # 93-03-256 03/30/93 15:53

Client: DRESSER INDUSTRIES

TEST RESULTS BY SAMPLE

Sample: 01A C/A 1364 NO. 13

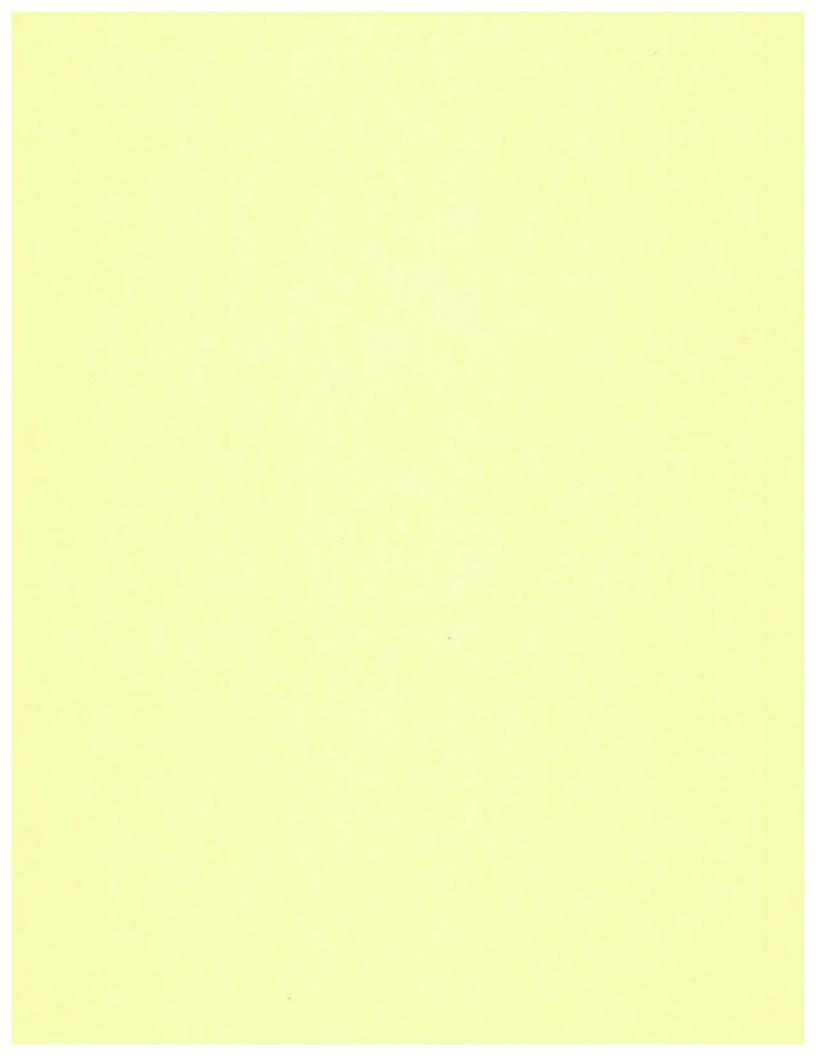
Collected: 03/15/93 06:00

Test Name TCLP METALS	Method EPA_SW846	<u>Result</u>	Units	<u>Detectio</u> <u>Limit</u> Regulato	Started	<u>Analyst</u>
Arsenic	EPA_SW846	<0.50	MG/L	Limit 5.0	03/30/93	10
Barium	EPA_SW846	1.01	MG/L	100	03/30/93	JP JP
Cadmium Chromium	EPA_SW846	0.02	MG/L	1.0	03/28/93	JP
Lead	EPA_SW846 EPA_SW846	0.12	MG/L	5.0	03/28/93	JP
Mercury	EPA_SW846	<0.50 <0.008	MG/L MG/L	5.0 0.20	03/28/93 03/25/93	JP
Selenium	EPA_SW846	<0.50	MG/L	1.0	03/23/93	JA JP
Silver TCLP PREP.	EPA_SW846	<0.05	MG/L	5.0	03/23/93	JA
and the second s	SW-846 1311	03/20/93	DATE		03/21/93	JGH

Sample: 02A C/A 1364 NO. 14

Collected: 03/15/93 06:00

Test Name TCLP METALS	<u>Method</u> EPA_SW846	<u>Result</u>	Units	<u>Detectio</u> <u>Limit</u> Regulato	Started	Analyst
Arsenic	EPA_SW846	<0.50	MG/L	Limit	02/20/02	
Barium	EPA_SW846	0.95	MG/L	5.0 100	03/30/93 03/28/93	JP JP
Cadmium Chromium	EPA_SW846	<0.01	MG/L	1.0	03/28/93	JP
Lead	EPA_SW846 EPA_SW846	<0.05 <0.50	MG/L MG/L	5.0	03/28/93	JP
Mercury	EPA_SW846	<0.008	MG/L	5.0 0.20	03/28/93 03/25/93	JP JA
Selenium Silver	EPA_SW846	<0.50	MG/L	1.0	03/30/93	JP
TCLP PREP.	EPA_SW846 SW-846 1311	<0.05 03/20/93	MG/L DATE	5.0	03/23/93	JA
		, -0, 55	UNIL		03/21/93	JGH



### SwL

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Materials, environmental and geotechnical engineering, nondestructive, metallurgical and analytical services
222 CAVALCADE \* P.O. BOX 8768, HOUSTON, TEXAS 77249 \* 713 692-9151

Client DRESSER INDUSTRIES

P. O. BOX 1430

ALEXANDRIA, LA 71309-1430 318/640-6245 FAX 640-6322

Attn: TERRY TURNER

Client No. 2\_1928\_00 Report No. 93-03-489 Report Date 04/12/93 12:55

Project TCLP ANALYSIS-MSO 118645 Aches

Date Sampled <u>03/29/93</u>

Sample Type SOLID SAMPLES

P.O. # 167044-6

Sampled By CLIENT

Transported by DELIVERY SERVICE

Date Received 03/30/93

<u>Lab No.</u> 93-03-489-01

93-03-489-02

Sample Identification

C/A 1364 NO.15 -

SOUTHWESTERN LABORATORIES

Reviewed By

HECTOR CORONADO

xe: Jn

4/16/93

**DOCUMENT 4(B): 5 OF 31** 

TEST RESULTS BY SAMPLE

04/12/93 12:55

100 - 20

Client: DRESSER INDUSTRIES

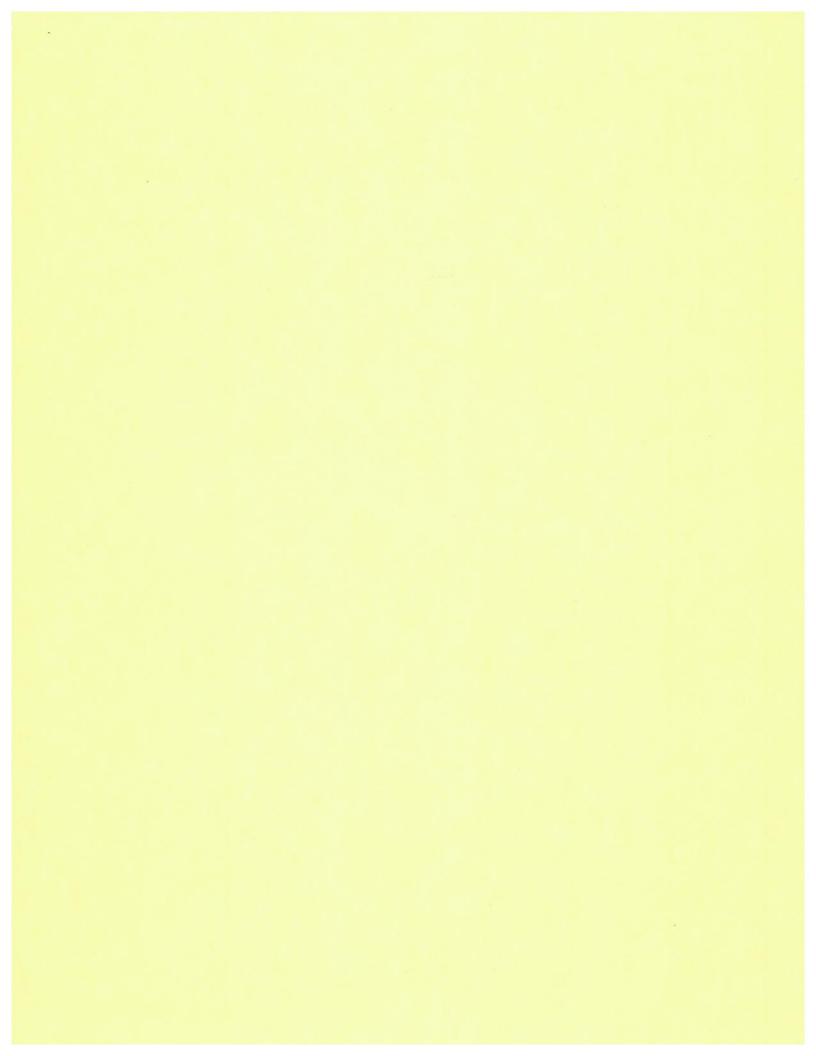
Sample: 01A C/A 1364 NO.15 Job: TCLP\_M TCLP METALS

Collected: 03/29/93 05:30

				Detectio	n Date	
Test Name	Method	<u>Result</u>	<u>Units</u>	Limit	Started	Analyst
TCLP METALS	EPA_SW846			Regulato	гу	
				Limit		
Arsenic	EPA_SW846	<0.50	MG/L	5.0	04/09/93	GLM
Barium	EPA_SW846	1.26	MG/L	100	04/06/93	GLM
Cadmium	EPA_SW846	<0.01	MG/L	1.0	04/06/93	GLM
Chromium	EPA_SW846	0.12	MG/L	5.0	04/06/93	GLM
Lead	EPA_SW846	<0.50	MG/L	5.0	04/06/93	GLM
Mercury	EPA_SW846	<0.008	MG/L	0.20	04/09/93	JA
Selenium	EPA_SW846	<0.50	MG/L	1.0	04/09/93	GLM
Silver	EPA_SW846	<0.05	MG/L	5.0	04/07/93	JA
TCLP PREP.	SW-846 1311	04/05/93	DATE		04/06/93	JH

Sample: 02A C/A 1364 NO.16 Collected: 03/29/93 05:30
Job: TCLP\_M TCLP METALS

<u>Detection</u> <u>Date</u> Test Name Method Result Units <u>Limit</u> <u>Started</u> <u>Analyst</u> TCLP METALS EPA\_SW846 Regulatory Limit Arsenic EPA SW846 <0.50 MG/L 5.0 04/09/93 GLM Barium 0.83 MG/L EPA\_SW846 100 04/06/93 GLM Cadmium EPA\_SW846 0.05 MG/L 1.0 04/06/93 GLM Chromium EPA\_SW846 0.80 MG/L 5.0 04/06/93 GLM Lead EPA SW846 3.40 MG/L 5.0 04/06/93 GLM Mercury EPA\_SW846 <0.008 MG/L 0.20 04/09/93 JA Selenium EPA\_SW846 <0.50 MG/L 1.0 04/09/93 GLM Silver EPA\_SW846 <0.05 MG/L 5.0 04/07/93 JA TCLP PREP. SW-846 1311 04/05/93 DATE 04/06/93 JH



# SWL

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Client DRESSER INDUSTRIES

P. O. BOX 1430

ALEXANDRIA, LA 71309-1430 318/640-6245 FAX 640-6322

Attn: TERRY TURNER

Client No. 2\_1928\_00 Report No. 93-04-193 Report Date 05/03/93 10:55

Project TCLP ANALYSIS-MSO 118739 ASh &

Date Sampled <u>04/05/93</u>

Sample Type SOLID SAMPLES

P.O. # 167044-6

Sampled By CLIENT

Transported by <u>DELIVERY SERVICE</u>

Date Received 04/15/93

Lab No. 93-04-193-01

93-04-193-02

Sample Identification

C/A 1364 NO. 17 -

C/A 1364 NO. 18\_

SOUTHWESTERN LABORATORIES

Reviewed By

HECTOR CORONADO

**DOCUMENT 4(B): 6 OF 31** 

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2.

05/03/93 10:55 Client: DRESSER INDUSTRIES

Sample: 01A C/A 1364 NO. 17

Collected: 04/05/93 06:00

Test Name TCLP METALS	<u>Method</u> EPA_SW846	<u>Result</u>	<u>Units</u>	<u>Detectio</u> <u>Limit</u> Regulato	Started	Analyst
Arsenic	EPA SW846	<0.50	MC //	Limit	0/ /70 /07	
Barium	EPA SW846		MG/L	5.0 100	04/30/93	GLM GLM
Cadmium	EPA_SW846		MG/L	1.0	04/30/93	GLM
Chromium	EPA_SW846	<0.05	MG/L	5.0	04/30/93	GLM
Lead	EPA_SW846	<0.50	MG/L	5.0	04/30/93	GLM
Mercury	EPA_SW846	<0.008	MG/L	0.20	04/29/93	JA
Selenium	EPA_SW846	<0.50	MG/L	1.0	04/30/93	GLM
Silver	EPA_SW846	<0.05	MG/L	5.0	04/24/93	JA
TCLP PREP.	SW-846 1311	04/21/93	DATE		04/22/93	JH

Sample: 02A C/A 1364 NO. 18

Collected: 04/05/93 06:00

Test Name TCLP METALS	<u>Method</u> EPA_SW846	<u>Result</u>	<u>Units</u>	<u>Detection</u> <u>Limit</u> Regulato	Started	Analyst
Arsenic	EPA_SW846	<0.50	MG/L	Limit 5.0	04/30/93	GLM
Barium	EPA_SW846	0.61	MG/L	100	04/30/93	GLM
Cadmium	EPA_SW846	<0.01	MG/L		04/30/93	GLM
Chromium	EPA_SW846	<0.05	MG/L		04/30/93	GLM
Lead	EPA_SW846	<0.50	MG/L	5.0	04/30/93	GLM
Mercury	EPA_SW846	<0.008	MG/L	0.20	04/29/93	JA
Selenium	EPA_SW846	<0.50	MG/L	1.0	04/30/93	GLM
Silver	EPA_SW846	<0.05	MG/L	5.0	04/24/93	JA
TCLP PREP.	SW-846 1311	04/21/93	DATE		04/22/93	JH

# SWL

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Client DRESSER INDUSTRIES

P. O. BOX 1430

ALEXANDRIA, LA 71309-1430 318/640-6245 FAX 640-6322

Attn: TERRY TURNER

Project TCLP ANALYSIS-MSO 118739 Ashes

Sampled By CLIENT

Sample Type SOLID SAMPLES

Date Sampled <u>04/12/93</u>

P.O. # 167044-6

Transported by <u>DELIVERY SERVICE</u>

Date Received 04/15/93

Lab No.

93-04-194-01

93-04-194-02

Sample Identification

C/A 1364 NO. 19 -

C/A 1364 NO. 20-

SOUTHWESTERN LABORATORIES

Client No. 2\_1928\_00

Report No. 93-04-194

Report Date 05/03/93 10:56

HECTOR CORONADO



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DOCUMENT 4(B):

VG: FAMILY

Order # 93-04-194 05/03/93 10:56

Client: DRESSER INDUSTRIES

TEST RESULTS BY SAMPLE

Sample: 01A C/A 1364 NO. 19 Collected: 04/12/93 06:00

W W.				Detectio	n Date	
Test Name	Method	<u>Result</u>	<u>Units</u>	Limit	Started	<b>Analyst</b>
TCLP METALS	EPA_SW846			Regulato	гу	
				Limit		
Arsenic	EPA_SW846	<0.50	MG/L	5.0	04/30/93	GLM
Barium	EPA_SW846	0.39	MG/L	100	04/30/93	GLM
Cadmium	EPA_SW846	<0.01	MG/L	1.0	04/30/93	GLM
Chromium	EPA_SW846	0.11	MG/L	5.0	04/30/93	GLM
Lead	EPA_SW846	<0.50	MG/L	5.0	04/30/93	GLM
Mercury	EPA_SW846	<0.008	MG/L	0.20	04/29/93	JA
Selenium	EPA_SW846	<0.50	MG/L	1.0	04/30/93	GLM
Silver	EPA_SW846	<0.05	MG/L		04/30/93	GLM
TCLP PREP.	SW-846 1311	04/22/93	DATE	:50.00	04/23/93	JH

Sample: 02A C/A 1364 NO. 20

Collected: 04/12/93 06:00

Test Name TCLP METALS	Method EPA_SW846	<u>Result</u>	<u>Units</u>	<u>Detection</u> <u>Limit</u> Regulato	Started	<u>Analyst</u>
Arsenic	EPA_SW846	<0.50	MG/L	Limit 5.0	04/30/93	GLM
Barium	EPA_SW846		MG/L	100	04/30/93	GLM
Cadmium	EPA_SW846	<0.01	MG/L	1.0	04/30/93	GLM
Chromium	EPA_SW846	<0.05	MG/L		04/30/93	GLM
Lead	EPA_SW846	<0.50	MG/L	5.0	04/30/93	GLM
Mercury	EPA_SW846	<0'.008	MG/L	0.20	04/29/93	JA
Selenium	EPA_SW846	<0.50	MG/L	1.0	04/30/93	GLM
Silver	EPA_SW846	<0.05	MG/L	5.0	04/30/93	GLM
TCLP PREP.	SW-846 1311	04/22/93	DATE		04/23/93	JH

SwL

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Materials, environmental and geotechnical engineering, nondestructive, metallurgical and analytical services 222 CAVALCADE \* P.O. BOX 8768, HOUSTON, TEXAS 77249 \* 713 692-9151

Client DRESSER INDUSTRIES

P. O. BOX 1430

ALEXANDRIA, LA 71309-1430 318/640-6245 FAX 640-6322

Attn: TERRY TURNER

Client No. 2\_1928 00 Report No. 93-04-256 Report Date 05/03/93 11:03

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Project TCLP ANALYSIS/MSO 118338 Hous

Date Sampled 04/19/93

Sample Type SOLID SAMPLES

P.O. # 167044-6

Lab No. 93-04-256-01

93-04-256-02

Sampled By CLIENT

Transported by DELIVERY SERVICE

Date Received 04/20/93

Sample Identification

C/A 1364 NO. 21 -

C/A 1364 NO. 22

SOUTHWESTERN LABORATORIES

Reviewed By

HECTOR CORONADO

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**DOCUMENT 4(B): 8 OF 31** 

05/03/93 11:03 Client: DRESSER INDUSTRIES

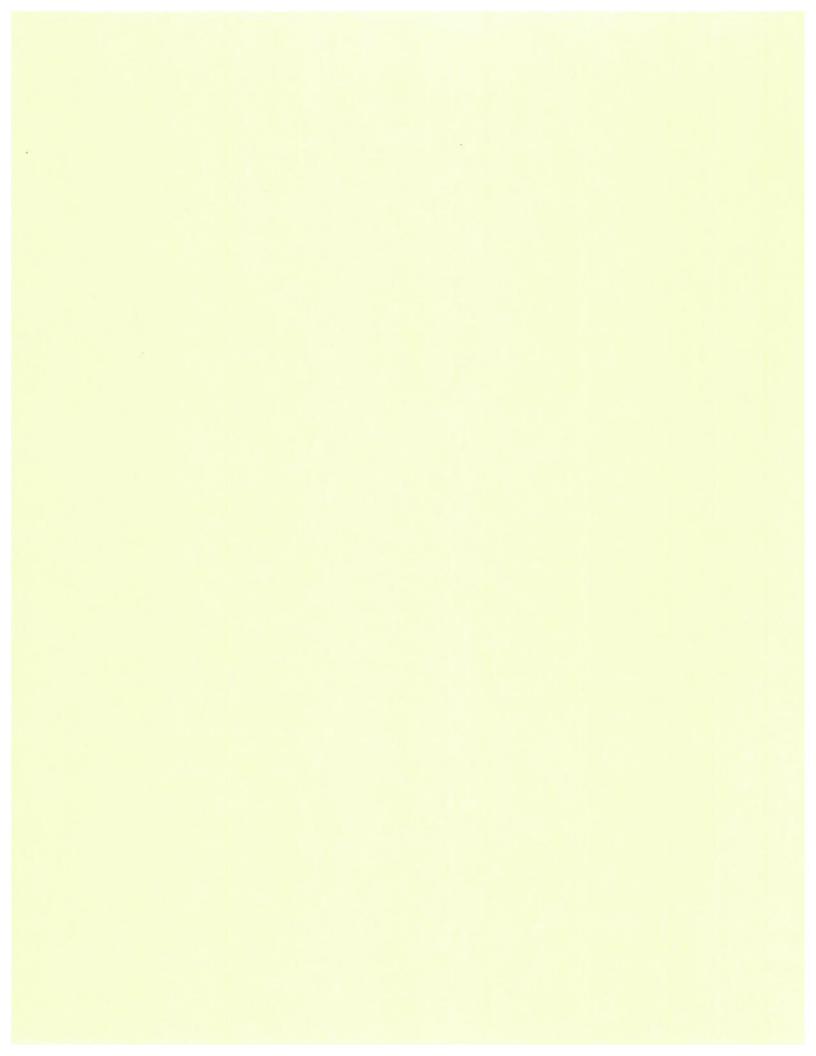
Sample: 01A C/A 1364 NO. 21 Collected: 04/19/93

Test Name TCLP METALS	<u>Method</u> EPA_SW846	<u>Result</u>	<u>Units</u>	<u>Detection</u> <u>Limit</u> Regulato	Started	Analyst
Arsenic	EPA SW846	<0.50	MG/L	Limit 5.0	04/30/93	GLM
Barium	EPA SW846		MG/L	100	04/30/93	GLM
Cadmium	EPA SW846	<0.01		1.0	04/30/93	GLM
Chromium	EPA SW846	0.26	MG/L	5.0	04/30/93	GLM
Lead	EPA_SW846	0.61	MG/L	5.0	04/30/93	GLM
Mercury	EPA_SW846	<0.008	MG/L	0.20	04/29/93	JA
Selenium	EPA_SW846	<0.50	MG/L	1.0	04/30/93	GLM
Silver	EPA_SW846	<0.05	MG/L	5.0	04/30/93	GLM
TCLP PREP.	SW-846 1311	04/26/93	DATE	15.23	04/27/93	JH

Sample: 02A C/A 1364 NO. 22

Collected: 04/19/93

Test Name	Method	5		Detection			
	<u>He thod</u>	<u>Result</u>	Units	<u>Limit</u>	Started	Analyst	
TCLP METALS	EPA_SW846	PA_SW846 Regulatory					
				Limit			
Arsenic	EPA_SW846	<0.50	MG/L	5.0	04/30/93	GLM	
Barium	EPA_SW846	1.21	MG/L	100	04/30/93	GLM	
Cadmium	EPA_SW846	<0.01	MG/L	1.0	04/30/93	GLM	
Chromium	EPA_SW846	<0.05	MG/L	5.0	04/30/93	GLM	
Lead	EPA_SW846	<0.50	MG/L		04/30/93	GLM	
Mercury	EPA_SW846	<0.008	MG/L	0.20	04/29/93	JA	
Selenium	EPA_SW846	<0.50		1.0	04/30/93	GLM	
Silver	EPA SW846	<0.05	MG/L	5.0	04/30/93	GLM	
TCLP PREP.	SW-846 1311		DATE	2.0	04/27/93	JH	



## SWL

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Client DRESSER INDUSTRIES

P. O. BOX 1430

ALEXANDRIA, LA 71309-1430 318/640-6245 FAX 640-6322 Attn: TERRY TURNER

Client No. 2\_1928\_00 Report No. 93-04-339 Report Date 05/10/93 14:10

Project MSO 118338/TCLP ANALYSIS ASheS

Date Sampled <u>04/26/93</u>

Sample Type SOLID SAMPLES

P.O. # \_\_\_\_

Transported by <u>DELIVERY SERVICE</u>

Date Received 04/27/93

Sampled By CLIENT

Lab No. 93-04-339-01 93-04-339-02

Sample Identification

C/A 1364 NO. 23 C/A 1364 NO. 24~

SOUTHWESTERN LABORATORIES

Reviewed By

HECTOR CORONADO

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**DOCUMENT 4(B): 9 OF 31** 

Order # 93-04-339 05/10/93 14:10

Client: DRESSER INDUSTRIES

TEST RESULTS BY SAMPLE

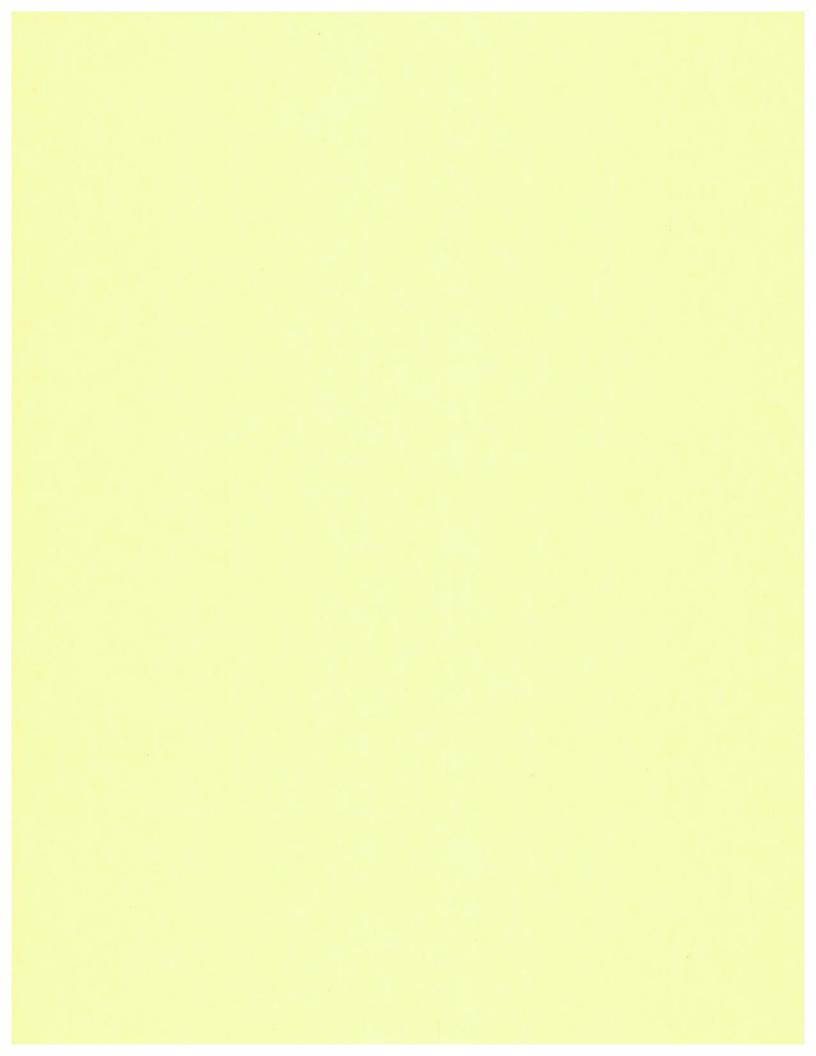
Sample: 01A C/A 1364 NO. 23

Collected: 04/26/93 06:00

Test Name TCLP METALS	<u>Method</u> EPA_SW846	Result	<u>Units</u>	<u>Detectio</u> <u>Limit</u> Regulato	Started	Analyst
Arsenic	EPA SW846	<0.50	HC/I	Limit	05 440 407	V2:
Barium	EPA_SW846	0.59	MG/L	5.0 100	05/10/93 05/08/93	JP JP
Cadmium Chromium	EPA_SW846	<0.01	MG/L	1.0		JP
Lead	EPA_SW846 EPA SW846	0.13 <0.50		5.0		JP
Mercury	EPA_SW846		MG/L	5.0 0.20	05/08/93 05/06/93	JP JA
Selenium Silver	EPA_SW846		MG/L	1.0	05/10/93	JP
TCLP PREP.	EPA_SW846 SW-846 1311	<0.05 04/29/93	MG/L DATE	5.0	05/08/93	JA
	0.1 010 1511	04/27/73	DATE		04/30/93	JH

Sample: 02A C/A 1364 NO. 24 Collected: 04/26/93 06:00

Test Name TCLP METALS	Method EPA_SW846	Result	<u>Units</u>	<u>Detectio</u> <u>Limit</u> Regulato	Started	Analyst
Arsenic	EPA_SW846	<0.50	MG/L	Limit 5.0	05/10/93	10
Barium	EPA_SW846		MG/L	100	22	
Cadmium	EPA_SW846	0.014				0.75.55
Chromium	EPA_SW846	<0.05	MG/L		14010 10 to 100 10 to 10	
Lead	EPA_SW846	<0.50	MG/L	5.0	05/08/93	JP
Mercury Selenium	EPA_SW846	<0.008	MG/L	0.20	05/06/93	JA
Silver	EPA_SW846	<0.50	MG/L	1.0	05/10/93	JP
TCLP PREP.	EPA_SW846	<0.05	MG/L	5.0	05/08/93	JA
THE THEF.	SW-846 1311	04/29/93	DATE		04/30/93	JH



# SwL

#### SOUTHWESTERN LABORATORIES



Materials, environmental and geotechnical engineering, nondestructive, metallurgical and analytical services
222 CAVALCADE \* P.O. BOX 8768, HOUSTON, TEXAS 77249 \* 713 692-9151

Client DRESSER INDUSTRIES

P. O. BOX 1430

ALEXANDRIA, LA 71309-1430 318/640-6245 FAX 640-6322

Attn: TERRY TURNER

Client No. 2\_1928\_00 Report No. 93-05-025 Report Date 05/19/93 08:44

Project MSO 118338/TCLP ANALYSIS Ashes

Date Sampled <u>05/03/93</u>

Sample Type SOLID SAMPLES

P.O. # 167044-6

Sampled By CLIENT

Transported by <u>DELIVERY SERVICE</u>

Date Received 05/04/93

<u>Lab No.</u> 93-05-025-01

93-05-025-02

Sample Identification

C/A 1364 NO. 25 / C/A 1364 NO. 26 /

SOUTHWESTERN LABORATORIES

Reviewed By

HECTOR CORONADO

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DOCUMENT 4(B): 10 OF 31

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Client: DRESSER INDUSTRIES

Sample: 01A C/A 1364 NO. 25

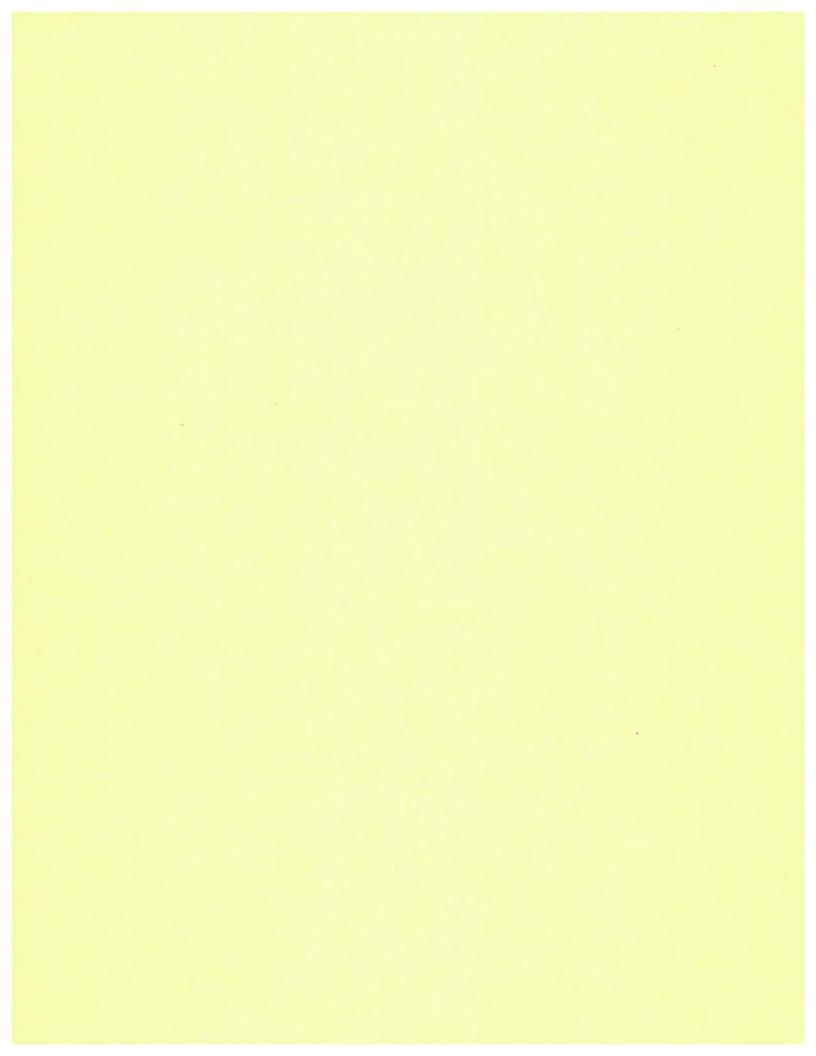
Collected: 05/03/93

Test Name TCLP METALS	Method EPA_SW846	<u>Resul t</u>	<u>Units</u>	<u>Detection</u> <u>Limit</u> Regulato	Started	Analyst
Arsenic	EDA CURZA	2.1		Limit		
Barium	EPA_SW846	<0.50	MG/L	5.0	05/18/93	GLM
Cadmium	EPA_SW846	0.83	MG/L	100	05/18/93	GLM .
	EPA_SW846	<0.01	MG/L	1.0	05/18/93	GLM
Chromium	EPA_SW846	0.17	MG/L	5.0	05/18/93	
Lead	EPA SW846	<0.50	MG/L			GLM
Mercury	EPA SW846		van de la companya de		05/18/93	GLM
Selenium		<0.008	MG/L	0.20	05/12/93	JA
Silver	EPA_SW846	<0.50	MG/L	1.0	05/18/93	GLM
TCLP PREP.	EPA_SW846	<0.05	MG/L	5.0	05/12/93	JA
TOLF PREP.	SW-846 1311	05/07/93	DATE		05/08/93	JH .

Sample: 02A C/A 1364 NO. 26

Collected: 05/03/93

Test Name TCLP METALS	Method EPA_SW846	<u>Result</u>	<u>Units</u>	<u>Limit</u> Regulato	Started	Analyst
Arsenic	EPA SW846	<0.50	MC /I	Limit		
Barium	EPA SW846			5.0	05/18/93	GLM
Cadmium			MG/L	100	05/18/93	GLM
Chromium	EPA_SW846	<0.01	MG/L	1.0	05/18/93	GLM
ADDOLAGIANTA DAM	EPA_SW846	<0.05	MG/L	5.0	05/18/93	GLM
Lead	EPA_SW846	<0.50	MG/L			
Mercury	EPA SW846	<0.008	MG/L	Month Colores		
Selenium	EPA SW846	\$0.585.584.885.4 <del>5</del> 36	10011100 <b>1</b> 000	0.20	05/12/93	JA
Silver		<0.50	MG/L	1.0	05/18/93	GLM
TCLP PREP.	EPA_SW846	<0.05	MG/L	5.0	05/12/93	JA
TOLF FREF.	SW-846 1311	05/07/93	DATE		05/08/93	JH





### SOUTHWESTERN LABORATORIES

P.O. BOX 8768, HOUSTON, TEXAS 77249 \* 713 692-9151

Client DRESSER INDUSTRIES

P. O. BOX 1430

ALEXANDRIA, LA 71309-1430 318/640-6245 FAX 640-6322

Attn: TERRY TURNER

Client No. 2\_1928\_00 Report No. 93-05-136 Report Date 05/24/93 11:08

Project MSO 118813-TCLP ANALYSIS ASTURES

Date Sampled <u>05/10/93</u>

Sample Type SOLID SAMPLES

P.O. # 167590-6

Lab No. 93-05-136-01 93-05-136-02 Sampled By CLIENT

Transported by <u>DELIVERY SERVICE</u>

Date Received 05/12/93

Sample Identification

C/A 1364 NO. 27 /

C/A 1364 NO. 28 -

HECTOR CORONADO

SOUTHWESTERN LABORATORIES

DOCUMENT 4(B): 11 OF 31

05/24/93 11:08

Client: DRESSER INDUSTRIES

Sample: 01A C/A 1364 NO. 27 Collected: 05/10/93

Test Name TCLP METALS	<u>Method</u> EPA_SW846	Result	<u>Units</u>	<u>Detection</u> <u>Limit</u> Regulato	Started	Analyst
				Limit		
Arsenic	EPA_SW846	<0.50	MG/L	5.0	05/18/93	GLM
Barium	EPA_SW846	1.88	MG/L	100	05/18/93	GLM
Cadmium	EPA_SW846	<0.01	MG/L	1.0	05/18/93	GLM
Chromium	EPA_SW846	0.88	MG/L	5.0	05/18/93	GLM
Lead	EPA_SW846	0.54	MG/L	5.0	05/18/93	GLM
Mercury	EPA_SW846	<0.008	MG/L	0.20	05/20/93	JA
Selenium	EPA_SW846	<0.50	MG/L	1.0	05/18/93	JP
Silver	EPA_SW846	<0.05	MG/L	5.0	05/21/93	JP
TCLP PREP.	SW-846 1311	05/13/93	DATE		05/14/93	JH

Sample: 02A C/A 1364 NO. 28 Collected: 05/10/93

Test Name	Method	Result	Units	<u>Detectio</u> <u>Limit</u>	n <u>Date</u> Started	Analyst
TCLP METALS	EPA_SW846			Regulato		Midtyst
				Limit	i i	
Arsenic	EPA_SW846	<0.50	MG/L	5.0	05/18/93	GLM
Barium	EPA_SW846	0.55	MG/L	100	05/18/93	GLM
Cadmium	EPA_SW846	<0.01	MG/L	1.0	05/18/93	GLM
Chromium	EPA_SW846	0.64	MG/L	5.0	05/18/93	GLM
Lead	EPA_SW846	<0.50		5.0	05/18/93	GLM
Mercury	EPA_SW846	<0.008	MG/L	0.20	05/20/93	JA
Selenium	EPA SW846	<0.50	MG/L	1.0	05/18/93	JP
Silver	EPA SW846	<0.05	MG/L	5.0	05/21/93	JP
TCLP PREP.	SW-846 1311	05/13/93	DATE	5.0	05/14/93	JH



### SOUTHWESTERN LABORATORIES

222 CAVALCADE P.O. BOX 8768, HOUSTON.TEXAS 77249 \* 713 692-9151

Client DRESSER INDUSTRIES

P. O. BOX 1430

ALEXANDRIA, LA 71309-1430

318/640-6245 FAX 640-6322

Attn: RON GRUENER

Project MSO 118813-TCLP ANALYSIS

Date Sampled <u>05/17/93</u> <u>05/20/93</u>

Sample Type SOLID SAMPLES

P.O. # 167590-6

Lab No.

93-05-323-01

93-05-323-02

93-05-323-03

93-05-323-04

Sampled By CLIENT

Transported by <u>DELIVERY SERVICE</u>

Client No. 2\_1928\_00

Report No. 93-05-323

Report Date 06/03/93 08:45

Date Received 05/25/93

Sample Identification

C/A 1364 NO. 29 🗸

C/A 1364 NO. 30 🗸

C/A 1364 NO. 31 ~

C/A 1364 NO. 32 -

SOUTHWESTERN LABORATORIES

Reviewed By

HECTOR CORONADO

**DOCUMENT 4(B): 12 OF 31** 

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TEST RESULTS BY SAMPLE

Client: DRESSER INDUSTRIES

Sample: 01A C/A 1364 NO. 29

Collected: 05/20/93

<u>Detection</u> <u>Date</u> Test Name

Method Result Units Limit Started Analyst TCLP PREP. SW-846 1311 05/26/93 DATE 05/27/93 JH

Sample: 02A C/A 1364 NO. 30 Collected: 05/20/93

<u>Detection</u> <u>Date</u> Test Name

Method Result Units <u>Limit</u> <u>Started</u> <u>Analyst</u> TCLP PREP. SW-846 1311 05/26/93 DATE 05/27/93 JH

Sample: 03A C/A 1364 NO. 31 Collected: 05/17/93

<u>Detection</u> <u>Date</u> Test Name Method Result Units

<u>Limit</u> <u>Started</u> <u>Analyst</u> TCLP PREP. SW-846 1311 05/26/93 DATE 05/27/93 JH

Sample: 04A C/A 1364 NO. 32 Collected: 05/17/93

<u>Detection</u> <u>Date</u> Test Name

Result Units <u>Limit</u> <u>Started</u> <u>Analyst</u> TCLP PREP. SW-846 1311 - 05/26/93 DATE 05/27/93 JH

Order # 93-05-323 06/03/93 08:45

Client: DRESSER INDUSTRIES

TEST RESULTS BY SAMPLE

ample Description: C/A 1364 NO. 29

Test Description: TCLP METALS

Collected: 05/20/93

Lab No: 01A

Method: EPA\_SW846

Test Code: TCLP\_M

### TCLP METALS

PARAMETER	МЕТНОО	RESULT	UNITS.	REGULATORY <u>LIMIT</u>	DATE RUN	ANALYST
Arsenic	SW-846 7060	<0.50	_mg/L	5.0	05/28/93	_JP
Barium	SW-846 7080	0.80	mg/L	100	05/28/93	<u>_JP</u>
Cadmium	SW-846 7130	0.088	_mg/L	1.0	05/28/93	<u>JP</u>
Chromium	SW-846 7190	<0.05	mg/L	5.0	05/28/93	JP
Lead	SW-846 7420	<0.50	_mg/L	5.0	05/28/93	JP
Mercury	_SW-846 7470	<0.008	_mg/L	0.20	05/28/93	_JA
Selenium	SW-846 7740	<0.50	mg/L	1.0	05/28/93	JP
Silver	SW-846 7760	<0.05	mg/L	5.0	05/29/93	JA

Order # 93-05-323 06/03/93 08:45

Client: DRESSER INDUSTRIES

TEST RESULTS BY SAMPLE

^ample Description: C/A 1364 NO. 30 Test Description: TCLP METALS

Collected: 05/20/93

Lab No: 02A

Method: EPA\_SW846 Test Code: TCLP\_M

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PARAMETER	METHOD	RESULT	UNITS	REGULATORY LIMIT	DATE <u>RUN</u>	ANALYST
Arsenic	SW-846 7060	<0.50	mg/L	5.0	05/28/93	_JP
Barium	SW-846 7080	0.81	_mg/L	100	05/28/93	_JP
Cadmium	SW-846 7130	0.14	mg/L	1.0	05/28/93	JP
Chromium	SW-846 7190	<0.05	mg/L	5.0	05/28/93	_JP
Lead	SW-846 7420	<0.50	mg/L	5.0	05/28/93	_JP
Mercury	SW-846 7470	<0.008	_mg/L	0.20	05/28/93	_JA
Selenium	SW-846 7740	<0.50	_mg/L	1.0	05/28/93	JP
Silver	_SW-846 7760	<0.05	mg/L	5.0	05/29/93	_JA

Order # 93-05-323 06/03/93 08:45

Client: DRESSER INDUSTRIES

TEST RESULTS BY SAMPLE

ample Description: C/A 1364 NO. 31

Test Description: TCLP METALS

Collected: 05/17/93

Lab No: 03A

Method: EPA\_SW846 Test Code: TCLP\_M

PARAMETER	METHOO	RESULT	UNITS	REGULATORY LIMIT	DATE RUN	ANALYST
Arsenic	SW-846 7060	<0.50	mg/L	5.0	05/28/93	JP
Barium	SW-846 7080	2.18	mg/L	100	05/28/93	JP
Cadmium	SW-846 7130	0.018	mg/L	1.0	05/28/93	_JP
Chromium	SW-846 7190	0.71	mg/L	5.0	05/28/93	_JP
Lead	SW-846 7420	<0.50	_mg/L	5.0	05/28/93	_ <u>JP</u>
Mercury	_SW-846_7470	<0.008	mg/L	0.20	05/28/93	_JA
Selenium	SW-846 7740	<0.50	mg/L	1.0	05/28/93	_JP
Silver	_SW-846_7760	<0.05	mg/L	5.0	05/29/93	JA

Order # 93-05-323 06/03/93 08:45

Client: DRESSER INDUSTRIES

TEST RESULTS BY SAMPLE

ample Description: C/A 1364 NO. 32

Test Description: TCLP METALS

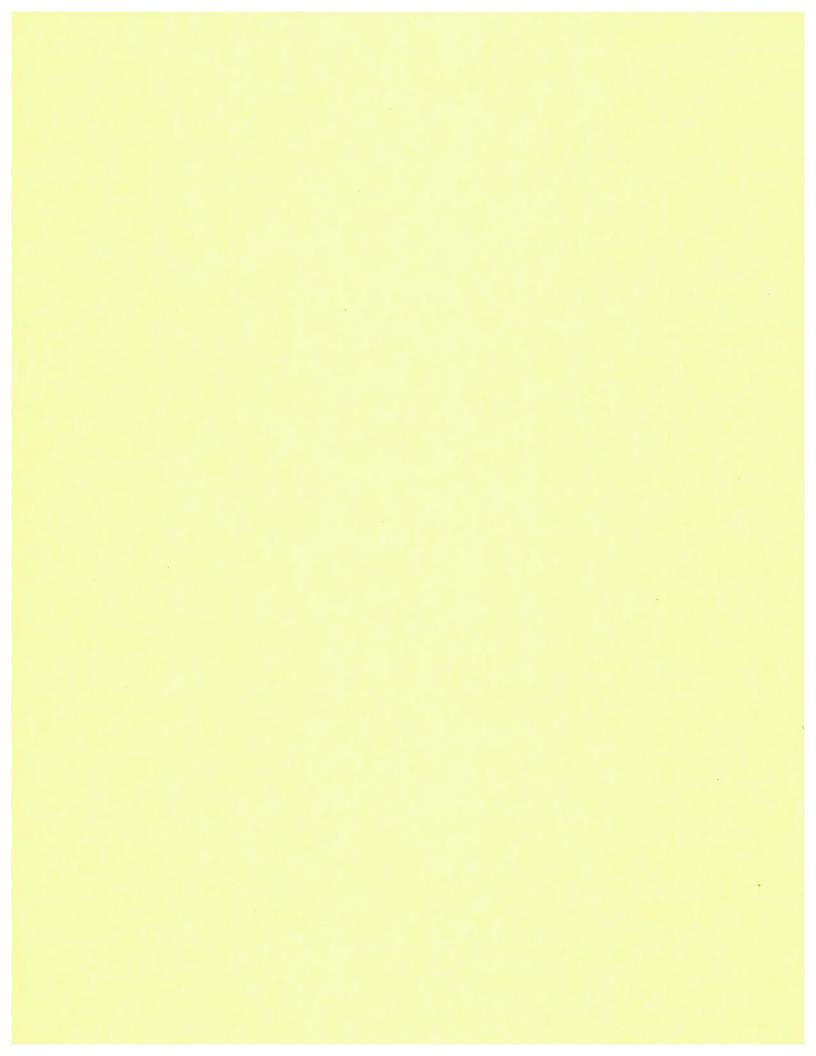
Collected: 05/17/93

Lab No: 04A

Method: EPA\_SW846

Test Code: TCLP\_M

PARAMETER	METHOD	RESULT	UNITS	REGULATORY LIMIT	DATE RUN	ANALYST
Arsenic	SW-846 7060	<0.50	_mg/L	5.0	05/28/93	_JP
Barium	SW-846 7080	0.46	mg/L	100	05/28/93	JP
Cadmium	SW-846 7130	0.038	_mg/L	1.0	05/28/93	JP
Chromium	SW-846 7190	<0.05	mg/L	5.0	05/28/93	_JP
Lead	SW-846 7420	<0.50	_mg/L	5.0	05/28/93	JP
Mercury	SW-846 7470	<0.008	_mg/L	0.20	05/28/93	JA
Selenium	SW-846 7740	<0.50	mg/L	1.0	05/28/93	<u>JP</u>
Silver	SW-846 7760	<u>~0.05</u>	mg/L	5.0	05/29/93	





P.O. BOX 8768, HOUSTON, TEXAS 77249 \* 713 692-9151

Client DRESSER INDUSTRIES

P. O. BOX 1430

ALEXANDRIA, LA 71309-1430 318/640-6245 FAX 640-6322

Attn: TERRY TURNER

Client No. 2 1928 00 Report No. 93-06-024 Report Date 06/15/93 13:28

Project MSO 118813/TCLP ANALYSIS Culles

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Sample Type SOLID SAMPLES

P.O. # 167590-6

Sampled By CLIENT

Transported by <u>DELIVERY SERVICE</u>

Date Received 06/02/93

Lab No.

93-06-024-01

93-06-024-02

Sample Identification

C/A 1364 NO. 33 -

C/A 1364 NO. 34-

SOUTHWESTERN LABORATORIES

Reviewed By

HECTOR CORONADO

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DOCUMENT 4(B): 13 OF 31

Order # 93-06-024 06/16/93 07:57

Client: DRESSER INDUSTRIES

TEST RESULTS BY SAMPLE

Sample: 01A C/A 1364 NO. 33

Collected: 06/01/93 05:00

Test Name TCLP PREP.

<u>Method</u> SW-846 1311 Result Units 06/08/93 DATE <u>Detection</u> <u>Date</u>

<u>Limit</u> <u>Started</u> <u>Analyst</u>

06/09/93 JH

Sample: 02A C/A 1364 NO. 34

Collected: 06/01/93 05:00

Test Name

TCLP PREP.

<u>Method</u> SW-846 1311 Result Units 06/08/93 DATE <u>Detection</u> <u>Date</u>

<u>Limit</u> <u>Started</u> <u>Analyst</u>

06/09/93 JH

Order # 93-06-024 06/16/93 07:57

Client: DRESSER INDUSTRIES

TEST RESULTS BY SAMPLE

ple Description: C/A 1364 NO. 33

Test Description: TCLP METALS

Collected: 06/01/93 05:00

Lab No: 01A

Method: SW-846

Test Code: TCLP\_M

PARAMETER	METHOO	RESULT	UNITS	REGULATORY LIMIT	DATE RUN	ANALYST
Arsenic	SW-846 7060	<0.5	_mg/L	5.0	06/13/93	JP
Barium	SW-846 7080	0.601	_mg/L	100.0	06/13/93	_JP
Cadmium	SW-846 7130	<0.01	_mg/L	1.0	06/13/93	_JP
Chromium	SW-846 7190	<0.05	mg/L	5.0	06/13/93	_JP
Lead	SW-846 7420	<0.5	_mg/L	5.0	06/13/93	_JP
Mercury	SW-846 7470	<0.008	_mg/L	0.2	06/11/93	<u>_JP</u>
Selenium	SW-846 7740	<0.5	_mg/L	1.0	06/13/93	_ <u>JP</u>
Silver	SW-846 7760	<0.05	mg/L	5.0	06/10/93	_JP

Order # 93-06-024 06/16/93 07:57

Client: DRESSER INDUSTRIES

TEST RESULTS BY SAMPLE

mple Description: C/A 1364 NO. 34

Test Description: TCLP METALS

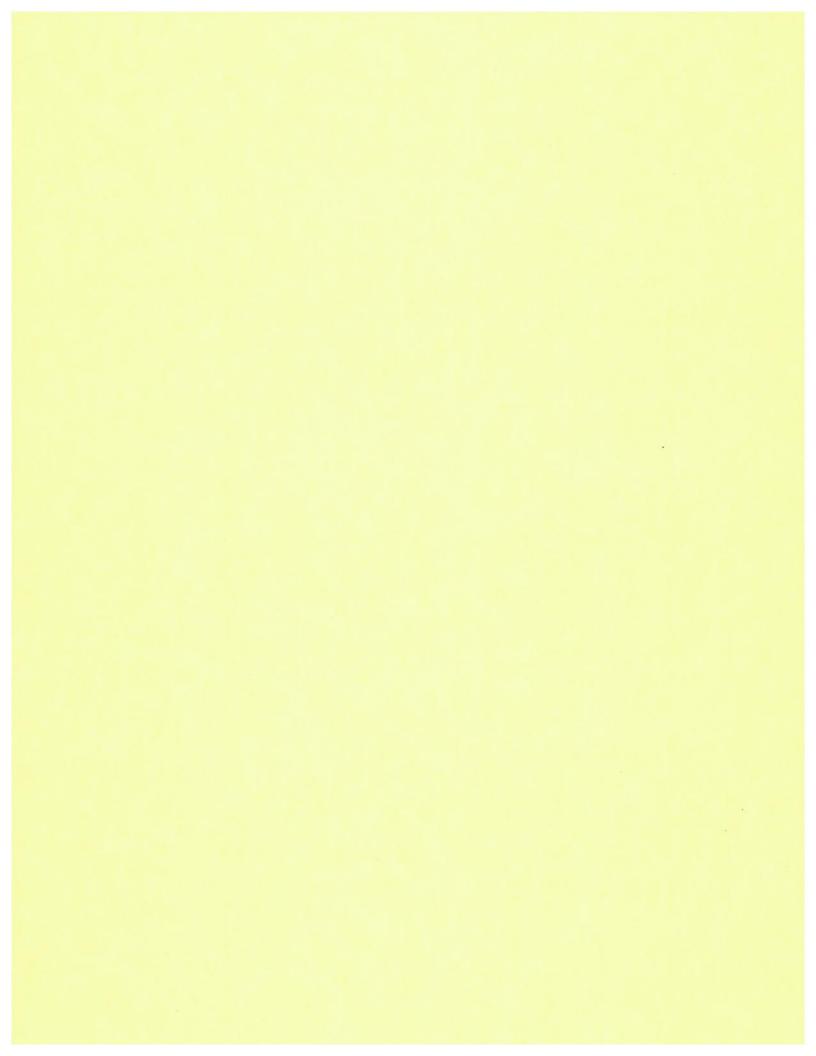
Collected: 06/01/93 05:00

Lab No: 02A

Method: SW-846

Test Code: TCLP\_M

PARAMETER	METHOD	RESULT	UNITS	REGULATORY LIMIT	DATE RUN	ANALYST
Arsenic	_SW-846_7060	<0.5	mg/L	5.0	06/13/93	_JP
Barium	SW-846 7080	0.870	mg/L	100.0	06/13/93	_JP
Cadmium	SW-846 7130	<0.01	mg/L	1.0	06/13/93	<u>JP</u>
Chromium	SW-846 7190	0.447	mg/L	5.0	06/13/93	JP
Lead	SW-846 7420	<0.5	mg/L	5.0	06/13/93	JP
Mercury	SW-846 7470	<0.008	mg/L	0.2	06/11/93	_JA
Selenium	SW-846 7740	<0.5	mg/L	1.0	06/13/93	_JP
Silver	SW-846 7760	<0.05	mg/L	5.0	06/10/93	_JA







\* P.O. BOX 8768, HOUSTON, TEXAS 77249 \* 713 692-9151

Client DRESSER INDUSTRIES

P. O. BOX 1430

ALEXANDRIA, LA 71309-1430 318/640-6245 FAX 640-6322

Attn: TERRY TURNER

Client No. 2\_1928\_00 Report No. 93-06-144 Report Date 06/21/93 15:33

Project MSO 118813/TCLP ANALYSIS as (co.

Date Sampled <u>06/07/93</u>

Sample Type SOLID SAMPLES

P.O. # 167590-6

Lab No. 93-06-144-01 93-06-144-02 Sampled By CLIENT

Transported by <u>DELVIERY SERVICE</u>

Date Received 06/09/93

Sample Identification

C/A 1364 NO. 35 -

C/A 1364 NO. 36

SOUTHWESTERN LABORATORIES

HECTOR CORONADO

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DOCUMENT 4(B): 14 OF 31

Order # 93-06-144 06/21/93 15:33

Client: DRESSER INDUSTRIES

TEST RESULTS BY SAMPLE

Sample: 01A C/A 1364 NO. 35

Collected: 06/07/93 06:00

Test Name

TCLP PREP.

<u>Method</u> SW-846 1311

Result Units
06/14/93 DATE

<u>Detection</u> <u>Date</u>

Limit Started Analyst 06/15/93 JH

Sample: 02A C/A 1364 NO. 36

Collected: 06/07/93 06:00

Test Name

TCLP PREP.

<u>Method</u> SW-846 1311

Result Units
06/14/93 DATE

<u>Detection</u> <u>Date</u>

Limit Started Analyst 06/15/93 JH

Order # 93-06-144 06/21/93 15:33

Client: DRESSER INDUSTRIES

TEST RESULTS BY SAMPLE

Test Description: C/A 1364 NO. 35

Collected: 06/07/93 06:00

Lab No: 01A

Method: SW-846

Test Code: TCLP\_M

PARAMETER	МЕТНОО	RESULT	UNITS	REGULATORY LIMIT	DATE RUN	ANALYST
Arsenic	SW-846 6010	<u>&lt;0.5</u>	_mg/L	5.0	06/15/93	_JP
Barium	SW-846 6010	1.11	<u>mg/L</u>	100.0	06/15/93	_JP
Cadmium	SW-846 6010	<0.01	_mg/L	1.0	06/15/93	_JP
Chromium	SW-846 6010	0.114	mg/L	5.0	06/15/93	JP
Lead	_SW-846_6010	<0.5	_mg/L	5.0	06/15/93	_ <u>JP</u>
Mercury	_SW-846 7470	<0.008	mg/L	0.2	06/18/93	_JA
Selenium	SW-846 6010	<0.5	_mg/L	1.0	06/15/93	_JP
Silver	SW-846 7760	<0.05	_mg/L	5.0	06/15/93	_JA

Order # 93-06-144 06/21/93 15:33

Client: DRESSER INDUSTRIES

TEST RESULTS BY SAMPLE

Sample Description: C/A 1364 NO. 36

Test Description: TCLP METALS

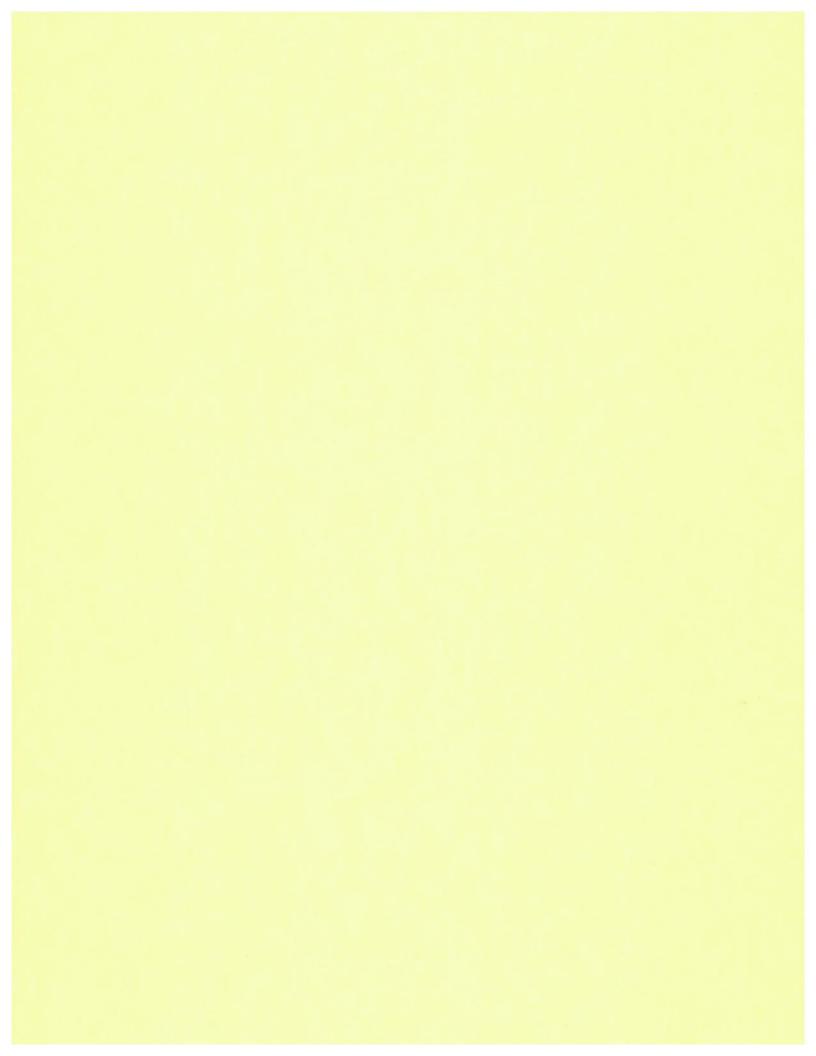
Collected: 06/07/93 06:00

Lab No: 02A

Method: SW-846

Test Code: TCLP\_M

PARAMETER	METHOD	RESULT	UNITS	REGULATORY LIMIT	DATE RUN	ANALYST
Arsenic	SW-846 6010	<0.5	mg/L	5.0	06/15/93	<u>JP</u>
Barium	SW-846 6010	1.00	mg/L	100.0	06/15/93	_JP
Cadmium	SW-846 6010	<0.01	mg/L	1.0	06/15/93	JP
Chromium	SW-846 6010	0.222	mg/L	5.0	06/15/93	JP
Lead	SW-846 6010	<0.5	mg/L	5.0	06/15/93	JP
Mercury	SW-846 7470	<0.008	_mg/L	0.2	06/18/93	_JA
Selenium	SW-846 6010	<0.5	_mg/L	1.0	06/15/93	_JP
Silver	SW-846 7760	<0.05	mg/L	5.0	06/15/93	_JA







P.O. BOX 8768, HOUSTON, TEXAS 77249 \* 713 692-9151 222 CAVALICADE

Client DRESSER INDUSTRIES

P. O. BOX 1430

ALEXANDRIA, LA 71309-1430 318/640-6245 FAX 640-6322

Attn: TERRY TURNER

Project MSO 118813/TCLP ANALYSIS Ca

Client No. 2\_1928\_00

Report No. 93-06-211

Report Date 06/21/93 15:42

Date Sampled <u>06/14/93</u>

Sample Type SOLID SAMPLES

P.O. # 167590-6

Lab No. 93-06-211-01 93-06-211-02 Sampled By CLIENT

Transported by <u>DELIVERY SERVICE</u>

Date Received 06/15/93

Sample Identification

C/A 1364 NO. 37 C/A 1364 NO. 38

SOUTHWESTERN LABORATORIES

Reviewed By

HECTOR CORONADO

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Order # 93-06-211 06/21/93 15:42

TEST RESULTS BY SAMPLE

Client: DRESSER INDUSTRIES

Sample: 01A C/A 1364 NO. 37

Collected: 06/14/93 06:00

Sample: 02A C/A 1364 NO. 38 Collected: 06/14/93 06:00

Order # 93-06-211 06/21/93 15:42

Client: DRESSER INDUSTRIES

TEST RESULTS BY SAMPLE

e Description: C/A 1364 NO. 37

est Description: TCLP METALS

Collected: 06/14/93 06:00

Lab No: 01A

Method: SW-846

Test Code: TCLP\_M

PARAMETER	METHOD	RESULT	UNITS	REGULATORY LIMIT	DATE RUN	ANALYST
Arsenic	SW-846 6010	<u>&lt;0.5</u>	mg/L	5.0	06/15/93	_JP
Barium	SW-846 6010	1.03	_mg/L	100.0	06/18/93	_JP
Cadmium	_sw-846_6010	0.019	mg/L	1.0	06/18/93	_JP
Chromium	_SW-846_6010	<0.05	mg/L	5.0	06/18/93	_JP
Lead	_SW-846_6010	<0.5	_mg/L	5.0	06/18/93	<u>_JP</u>
Mercury	SW-846 7470	<0.008	mg/L	0.2	06/18/93	_JA
Selenium	SW-846 6010	<u>&lt;0.5</u>	mg/L	1.0	06/15/93	_JP
Silver	SW-846 7760	<0.05	mg/L	5.0	06/17/93	_JA

Order # 93-06-211 06/21/93 15:42

Client: DRESSER INDUSTRIES

TEST RESULTS BY SAMPLE

ample Description: C/A 1364 NO. 38

Test Description: TCLP METALS

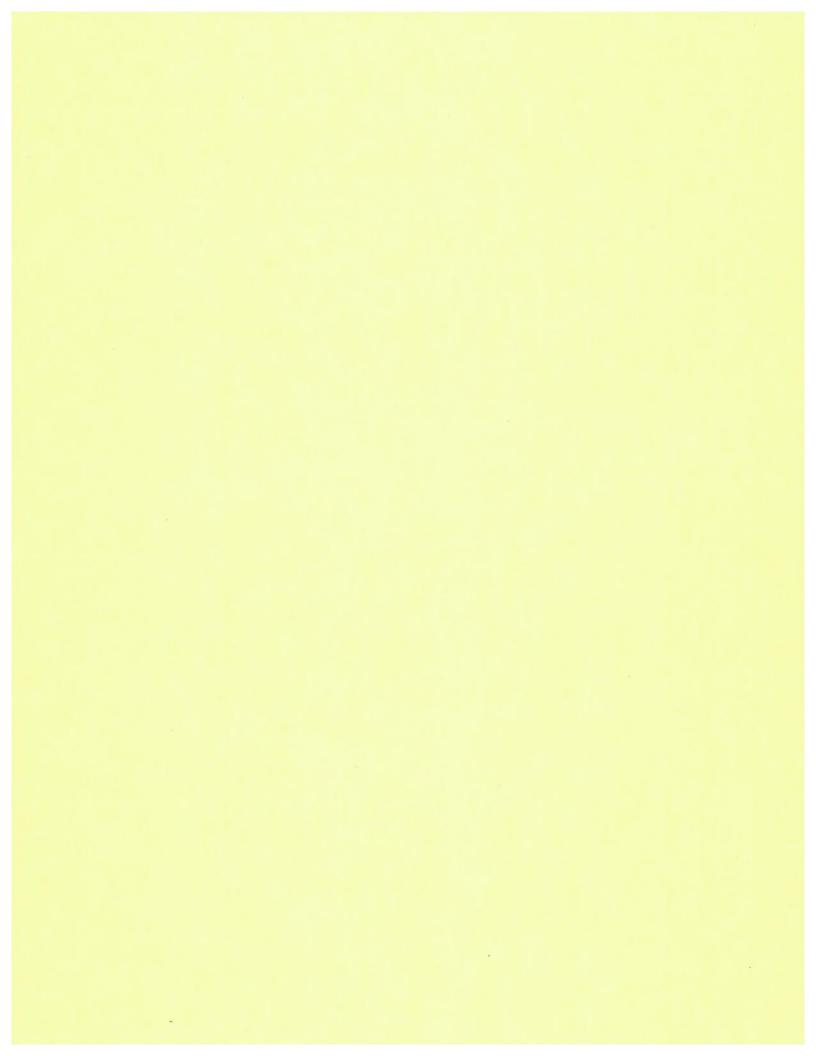
Collected: 06/14/93 06:00

Lab No: 02A

Method: SW-846

Test Code: TCLP\_M

PARAMETER	METHOO	RESULT	UNITS	REGULATORY LIMIT	DATE <u>Run</u>	ANALYST
Arsenic	SW-846 6010	<0.5	_mg/L	5.0	06/15/93	<u>_JP</u>
Barium	SW-846 6010	0.768	_mg/L	100.0	06/15/93	_ <u>JP</u>
Cadmium	_SW-846_6010	<0.01	_mg/L	1.0	06/15/93	_JP
Chromium	_SW-846_6010	<0.05	_mg/L	5.0	06/15/93	_ <u>JP</u>
Lead	SW-846 6010	<0.5	_mg/L	5.0	06/15/93	JP
Mercury	_SW-846_7470	<0.008	mg/L	0.2	06/18/93	_JA
Selenium	_SW-846_6010	<0.5	mg/L	1.0	06/15/93	_JP
Silver	SW-846 7760	<0.05	mg/L	5.0	06/17/93	AG







222 CAVALCADE \* P.O. BOX 8768, HOUSTON, TEXAS 77249 \* 713 692-9151

Client DRESSER INDUSTRIES

P. O. BOX 1430

ALEXANDRIA, LA 71309-1430 318/640-6245 FAX 640-6322 Attn: TERRY TURNER Client No. 2\_1928\_00 Report No. 93-06-380 Report Date 07/13/93 15:22

Project MSO 118813/TCLP ANALYSIS ASheS

Date Sampled <u>06/21/93</u>

Sample Type SOLID SAMPLES

P.O. # 167590-6

<u>Lab No.</u> 93-06-380-01 93-06-380-02 Sampled By CLIENT

Transported by <u>DELIVERY SERVICE</u>

Date Received 06/25/93

Sample Identification

C/A 1364 NO. 39 C/A 1364 NO. 40

SOUTHWESTERN LABORATORIES

HECTOR CORONADO

Reviewed By

XC IN Cleared for Puspin non-Haz.

**DOCUMENT 4(B): 16 OF 31** 

Order # 93-06-380 07/13/93 15:22 Client: DRESSER INDUSTRIES

TEST RESULTS BY SAMPLE

Sample: 01A C/A 1364 NO. 39

Collected: 06/21/93 06:00

Test Name TCLP PREP.

Method Result Units SW-846 1311 6/26/93 DATE

<u>Detection</u> <u>Date</u>

<u>Limit</u> <u>Started</u> <u>Analyst</u>

06/27/93 JH

Sample: 02A C/A 1364 NO. 40

Collected: 06/21/93 06:00

<u>Detection</u> <u>Date</u>

Test Name TCLP PREP.

Method

Result Units SW-846 1311 6/26/93 DATE

<u>Limit</u> Started Analyst 06/27/93 JH

Order # 93-06-380 07/13/93 15:22

Client: DRESSER INDUSTRIES

TEST RESULTS BY SAMPLE

imple Description: C/A 1364 NO. 39

Test Description: TCLP METALS

Collected: 06/21/93 06:00

Lab No: 01A

Method: SW-846

Test Code: TCLP\_M

PARAMETER	METHOD	RESULT	UNITS	REGULATORY LIMIT	DATE RUN	ANALYST
Arsenic	SW-846 6010	<0.500	mg/L	5.0	07/10/93	_JA
Barium	SW-846 6010	0.450	mg/L	100.0	07/09/93	GLM
Cadmium	SW-846 6010	0.038	mg/L	1.0	07/09/93	GLM
Chromium	SW-846 6010	0.682	_mg/L	5.0	07/09/93	GLM
Lead	SW-846 6010	<0.500	_mg/L	5.0	07/09/93	GLM
Mercury	SW-846 7470	<0.008	_mg/L	0.2	06/30/93	_JA
Selenium	SW-846 6010	<0.500	_mg/L	1.0	07/10/93	_JA
Silver	SW-846 7760	<0.050	_mg/L	5.0	07/06/93	_JA

Order # 93-06-380 07/13/93 15:22

Client: DRESSER INDUSTRIES

TEST RESULTS BY SAMPLE

Sample Description: C/A 1364 NO. 40

Test Description: TCLP METALS

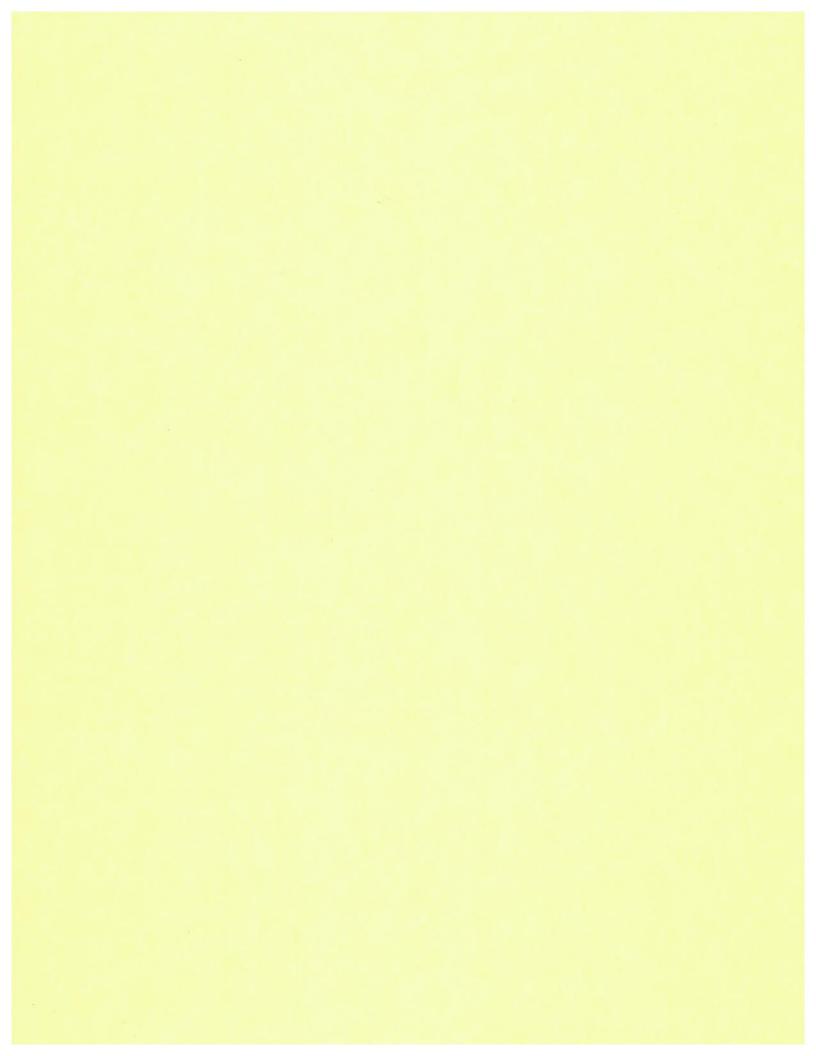
Collected: 06/21/93 06:00

Lab No: 02A

Method: SW-846

Test Code: TCLP\_M

PARAMETER	METHOO	RESULT	UNITS	REGULATORY LIMIT	DATE RUN	ANALYST
Arsenic	SW-846 6010	<0.500	_mg/L	5.0	07/06/93	_JA
Barium	SW-846 6010	0.639	mg/L	100.0	07/09/93	GLM
Cadmium	SW-846 6010	0.097	mg/L	1.0	07/09/93	GLM
Chromium	SW-846 6010	0.525	_mg/L	5.0	07/09/93	GLM
Lead	SW-846 6010	0.898	mg/L	5.0	07/09/93	GLM
Mercury	SW-846 7470	<0.008	_mg/L	0.2	06/30/93	
Selenium	SH-846 6010	<0.500	_m <sub>3</sub> /L	1.0	07/10/93	_JA
Silver	SW-846 7760	<0.050	mg/L	5.0	07/06/93	JA







222 CAVALCADE \* P.O. BOX 8768, HOUSTON, TEXAS 77249 \* 713 692-9151

Client DRESSER INDUSTRIES

P. O. BOX 1430

ALEXANDRIA, LA 71309-1430

318/640-6245 FAX 640-6322

Attn: TERRY TURNER

118813

Project MSO 11813/TCLP ANALYSIS Cal

Client No. 2\_1928\_00 Report No. 93-06-430 Report Date 07/13/93 15:25

Date Sampled <u>06/27/93</u>

Sample Type SOLID SAMPLES

P.O. # 167590-6

Lab No. 93-06-430-01 93-06-430-02 Sampled By CLIENT

Transported by <u>DELIVERY SERVICE</u>

Date Received 06/29/93

Sample Identification

C/A 1364 SAMPLE #41

C/A 1364 SAMPLE #42

SOUTHWESTERN LABORATORIES

HECTOR CORONADO

Cleared for Peoposed NON

DOCUMENT 4(B): 17 OF 31

Order # 93-06-430 07/13/93 15:25

Client: DRESSER INDUSTRIES

TEST RESULTS BY SAMPLE

Sample: 01A C/A 1364 SAMPLE #41 Collected: 06/27/93 06:00

Test Name

TCLP PREP.

Method SW-846 1311

Result Units 7/3/93 DATE

<u>Detection</u> <u>Date</u>

<u>Limit Started Analyst</u>

07/04/93 JH

Sample: 02A C/A 1364 SAMPLE #42 Collected: 06/27/93 06:00

Test Name

TCLP PREP.

Method SW-846 1311

Result Units 7/3/93 DATE

<u>Detection</u> <u>Date</u>

<u>Limit</u> <u>Started</u> <u>Analyst</u>

07/04/93 JH

Order # 93-06-430 07/13/93 15:25

Client: DRESSER INDUSTRIES

TEST RESULTS BY SAMPLE

Sample Description: C/A 1364 SAMPLE #41

Test Description: TCLP METALS

Collected: 06/27/93 06:00

Lab No: 01A

Method: SW-846

Test Code: TCLP\_H

PARAMETER	METHOD	RESULT	UNITS	REGULATORY LIMIT	DATE RUN	ANALYST
Arsenic	SW-846 6010	<0.500	mg/L	5.0	07/10/93	_JA
Barium	SW-846 6010	<0.220	_mg/L	100.0	07/10/93	JP
Cadmium	SW-846 6010	0.134	mg/L	1.0	07/10/93	JP
Chromium	SW-846 6010	0.493	mg/L	5.0	07/11/93	_JP
Lead	SW-846 6010	<0.500	_mg/L	5.0	07/11/93	JP
Mercury	_SW-846 7470	<0.008	_mg/L	0.2	07/07/93	_JA
Selenium	_SW-846_6010	<0.500	mg/L	1.0	07/10/93	_JA
Silver	SW-846 7760	<0.050	mg/L	5.0	07/07/93	_JA

Order # 93-06-430 07/13/93 15:25

Client: DRESSER INDUSTRIES

TEST RESULTS BY SAMPLE

Sample Description: C/A 1364 SAMPLE #42

Test Description: TCLP METALS

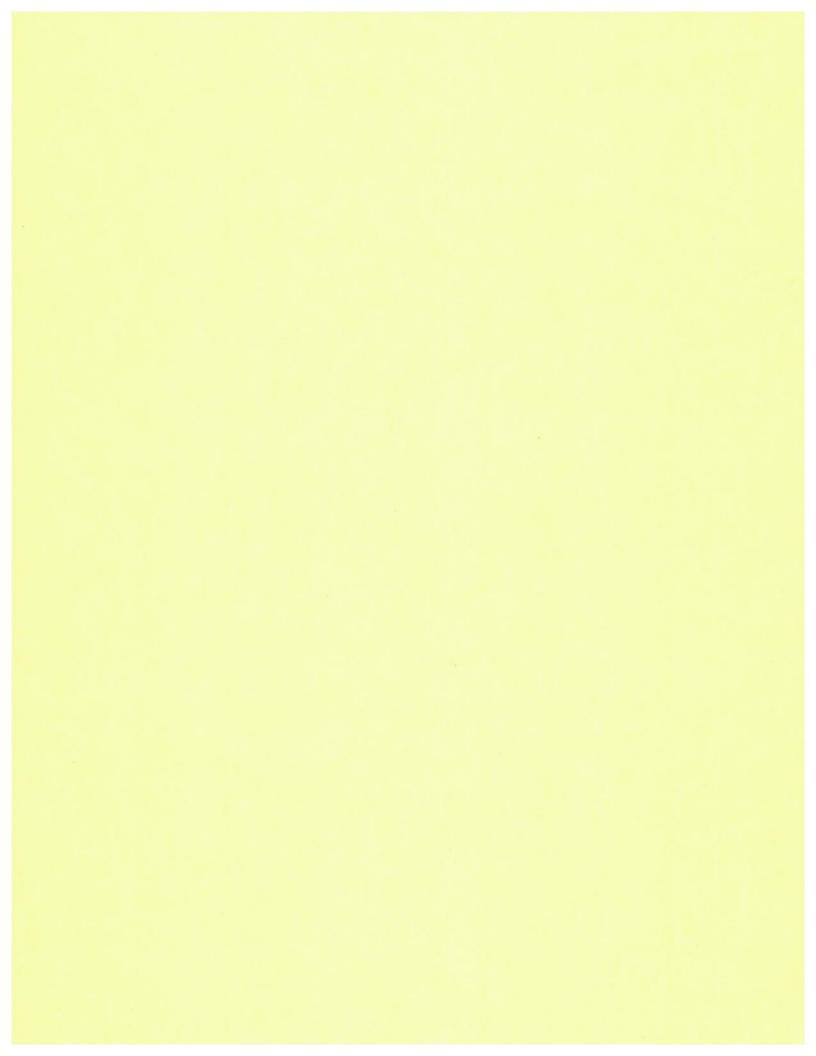
Collected: 06/27/93 06:00

Lab No: 02A

Method: SW-846

Test Code: TCLP\_M

PARAMETER	METHOD	RESULT	UNITS	REGULATORY LIMIT	DATE RUN	ANALYST
Arsenic	SW-846 6010	<0.500	mg/L	5.0	07/10/93	_JA
Barium	SW-846 6010	<0.220	_mg/L	100.0	07/10/93	_JP
Cadmium	SW-846 6010	0.114	_mg/L	1.0	07/10/93	_JP
Chromium	SW-846 6010	<u>&lt;0.050</u>	_mg/L	5.0	07/11/93	JP
Lead	_SW-846_6010	<0.500	mg/L	5.0	07/11/93	JP
Mercury	SW-846 7470	<0.008	mg/L	0.2	07/07/93	_JA
Selenium	SW-846 6010	<0.500	mg/L	1.0	07/10/93	_JA
Silver	SW-846 7760	<0.050	mg/L	5.0	07/07/93	_JA







222 CAVALCADE \* P.O. BOX 8768, HOUSTON, TEXAS 77249 \* 713 692-9151

Client DRESSER INDUSTRIES

P. O. BOX 1430

ALEXANDRIA, LA 71309-1430 318/640-6245 FAX 640-6322

Attn: T.A. TURNER

Client No. 2\_1928\_00 Report No. 93-07-151 Report Date 07/21/93 16:39

Project MS0119287/TCLP ANALYSIS aches

Date Sampled <u>07/06/93</u>

Sample Type SOLID SAMPLES

P.O. # 167590-6

<u>Lab No.</u> 93-07-151-01

93-07-151-02

Sampled By CLIENT

Transported by <u>DELIVERY SERVICE</u>

Date Received 07/13/93

Sample Identification C/A1364 SAMPLE #43

C/A 1364 SAMPLE #44

SOUTHWESTERN LABORATORIES

HECTOR CORONADO

XC IN

**DOCUMENT 4(B): 18 OF 31** 

Order # 93-07-151 07/22/93 10:01

Client: DRESSER INDUSTRIES

TEST RESULTS BY SAMPLE

Sample: 01A C/A1364 SAMPLE #43 Collected: 07/06/93 06:00

				Detection	n Date	
Test Name	Method	Result	<u>Units</u>	Limit	Started	Analyst
IGNITABILITY, CLOSED-CUP	SW-846 1010	>210	deg. F	0	07/16/93	SPL
REACTIVITY CYANIDE	SW-846 7.3.3	<0.40	ppm	0.40	07/16/93	
REACTIVITY SULFIDE	SW-846 7.3.4	<20	ppm		07/15/93	
TCLP PREP.	SW-846 1311	7/14/93	DATE		07/15/93	JH
рн	SW-846 9045	10.23	pH units		07/13/93	EU

Sample: 02A C/A 1364 SAMPLE #44 Collected: 07/06/93

				Detection	n Date	
Test Name	Method	Result	<u>Units</u>	Limit	Started	Analyst
IGNITABILITY, CLOSED-CUP	SW-846 1010	>210	deg. F		07/16/93	SPL
REACTIVITY CYANIDE	SW-846 7.3.3	<0.40	ррт	0.40	07/16/93	(0.071/0.17)
REACTIVITY SULFIDE	SW-846 7.3.4	<20	ppm		07/15/93	
TCLP PREP.	SW-846 1311	7/14/93	DATE		07/15/93	1.707
Н	SW-846 9045	10.04	pH units		07/13/93	

Order # 93-07-151 07/22/93 10:01

Sample Description: C/A1364 SAMPLE #43

Test Description: TCLP METALS

Collected: 07/06/93 06:00

Lab No: 01A

Method: SW-846

Test Code: TCLP\_M

PARAMETER	METHOD	RESULT	UNITS	REGULATORY LIMIT	DATE <u>Run</u>	ANALYST
Arsenic	SW-846 6010	<0.500	_mg/L	5.0	07/20/93	_JA
Barium	SW-846 6010	0.511	mg/L	100.0	07/19/93	_JP
Cadmium	SW-846 6010	<0.010	mg/L	1.0	07/19/93	_JP
Chromium	SW-846 6010	<0.050	mg/L	5.0	07/19/93	_JP
Lead	_SW-846_6010	<0.500	mg/L	5.0	07/19/93	JP
Mercury	SW-846 7470	<0.008	_mg/L	0.2	07/19/93	_JP
Selenium	_SW-846_6010	<0.500	mg/L	1.0	07/20/93	_ <u>JA</u>
Silver	SW-846 7760	<0.050	mg/L	5.0	07/19/93	_JP

Order # 93-07-151 07/22/93 10:01

Client: DRESSER INDUSTRIES

TEST RESULTS BY SAMPLE

Sample Description: C/A 1364 SAMPLE #44

Test Description: TCLP METALS

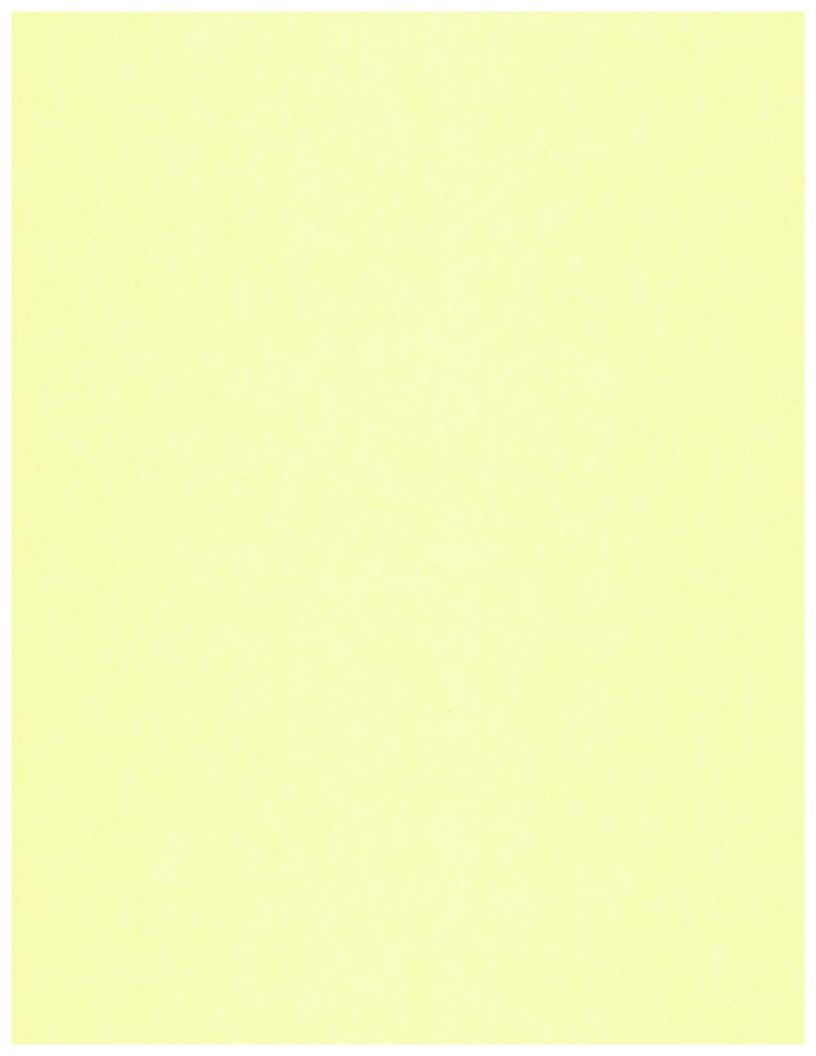
Collected: 07/06/93

Lab No: 02A

Method: SW-846

Test Code: TCLP\_M

PARAMETER	METHOO	RESULT	UNITS	REGULATORY LIMIT	DATE RUN	ANALYST
Arsenic	SW-846 6010	<0.500	_mg/L	5.0	07/20/93	_JA
Barium	SW-846 6010	<0.220	_mg/L	100.0	07/19/93	_JP
Cadmium	SW-846 6010	<0.010	_mg/L	1.0	07/19/93	_JP
Chromium	_SW-846_6010	<0.050	_mg/L	5.0	07/19/93	JP
Lead	SW-846 6010	<0.500	_mg/L	5.0	07/19/93	_JP
Mercury	SW-846 7470	<0.008	mg/L	0.2	07/20/93	_JA
Selenium	SW-846 6010	<0.500	mg/L	1.0	07/20/93	_JA
Silver	SW-846 7760	<0.050	mg/L	5.0	07/19/93	<u>JP</u>







222 CAVALCADE \* P.O. BOX 8768, HOUSTON, TEXAS 77249 \* 713 692-9151

Client DRESSER INDUSTRIES

P. O. BOX 1430

ALEXANDRIA, LA 71309-1430

318/640-6245 FAX 640-6322

Attn: T.A. TURNER

Client No. 2\_1928\_00 Report No. 93-07-152 Report Date 08/03/93 10:52

Project MS0119287/TCLP ANALYSIS Cicles

Date Sampled <u>07/12/93</u>

Sample Type SOLID SAMPLES

P.O. # 167590-6

Lab No. 93-07-152-01 93-07-152-02 Sampled By CLIENT

Transported by <u>DELIVERY SERVICE</u>

Date Received 07/13/93

Sample Identification

C/A 1364 SAMPLE #45 -

C/A 1364 SAMPLE #46 -

SOUTHWESTERN LABORATORIES

MARK TIPTON

**DOCUMENT 4(B): 19 OF 31** 

Order # 93-07-152 08/03/93 10:52

TEST RESULTS BY SAMPLE

Client: DRESSER INDUSTRIES

Sample: 01A C/A 1364 SAMPLE #45 Collected: 07/12/93 06:00

Took No.				Detection Date			
Test Name	Method	<u>Result</u>	Units	Limit	Started	Analyst	
IGNITABILITY, CLOSED-CUP	SW-846 1010	>210	deg. F		07/16/93	SPL	
REACTIVITY CYANIDE	SW-846 7.3.3	<0.40	ppm	0.40	07/16/93		
REACTIVITY SULFIDE	SW-846 7.3.4		ppm		07/15/93		
TCLP PREP.	SW-846 1311	07/14/93	DATE		07/15/93	JH	
рН	SW-846 9045	12.48	pH units		07/13/93	EU	

Sample: 02A C/A 1364 SAMPLE #46

Collected: 07/12/93 06:00

<b>-</b> '				Detection	n Date	
Test Name	Method	Result	Units	Limit	Started	Analyst
IGNITABILITY, CLOSED-CUP	SW-846 1010		deg. F		07/16/93	
REACTIVITY CYANIDE	SW-846 7.3.3	<0.40	ppm	0.40	07/16/93	
REACTIVITY SULFIDE	SW-846 7.3.4	<20	ppm		07/15/93	
TCLP PREP.	SW-846 1311	07/14/93	DATE		07/15/93	
Н	SW-846 9045	12.30	pH units		07/13/93	EU

, ' 'tq 3

Order # 93-07-152 08/03/93 10:52

Client: DRESSER INDUSTRIES

TEST RESULTS BY SAMPLE

Sample Description: C/A 1364 SAMPLE #45

Test Description: TCLP METALS

Lab No: 01A

Method: SW-846

Test Code: TCLP\_M

Collected: 07/12/93 06:00

PARAMETER	METHOD	RESULT	UNITS	REGULATORY LIMIT	DATE RUN	ANALYST
Arsenic	SW-846 6010	<0.500	mg/L	5.0	07/19/93	JP
Barium	SW-846 6010	<0.220	mg/L	100.0	07/19/93	_ <u>JP</u>
Cadmium	SW-846 6010	<0.010	mg/L	1.0	07/19/93	_JP
Chromium	SW-846 6010	0.299	mg/L	5.0	07/19/93	JP
Lead	SW-846 6010	<0.500	mg/L	5.0	07/19/93	_JP
Mercury	SW-846 7470	<0.008	mg/L	0.2	07/20/93	_JA
Selenium	_SW-846_6010	<0.500	_mg/L	1.0	07/20/93	JA
Silver	SW-846 7760	<0.050	mg/L	5.0	07/19/93	JP

Order # 93-07-152 08/03/93 10:52

Client: DRESSER INDUSTRIES

TEST RESULTS BY SAMPLE

Sample Description: C/A 1364 SAMPLE #46

Test Description: TCLP METALS

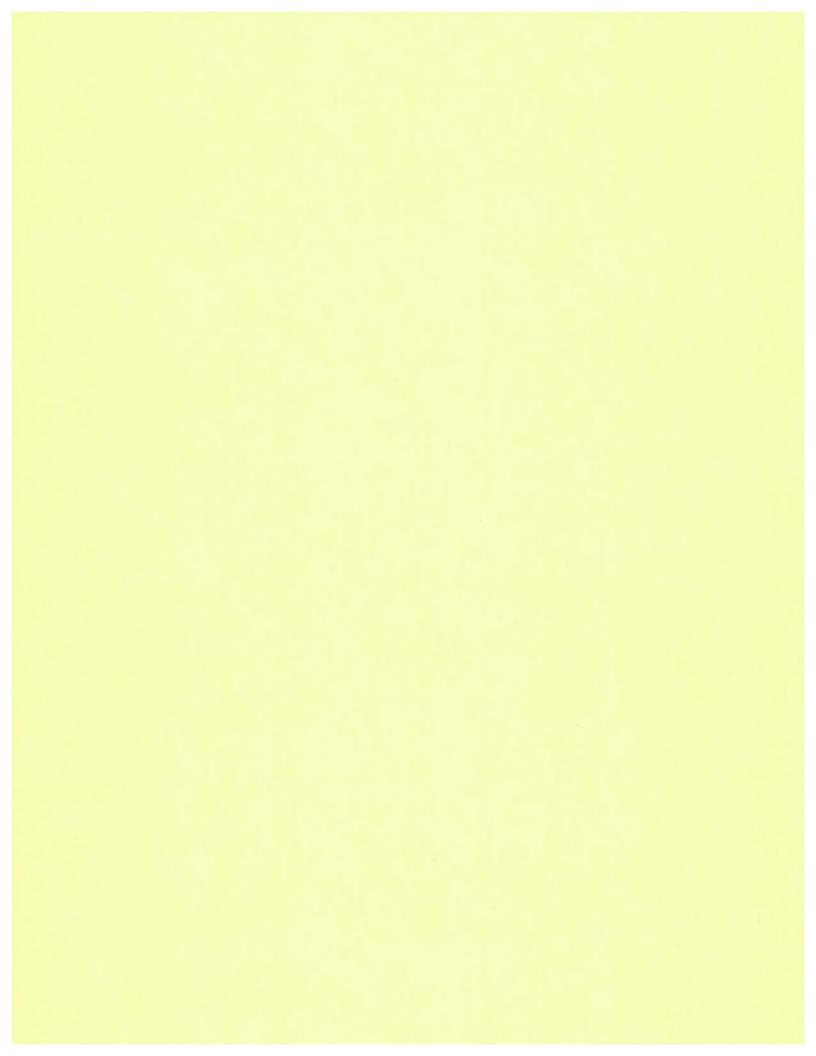
Collected: 07/12/93 06:00

Lab No: 02A

Method: SW-846

Test Code: TCLP\_M

PARAMETER	METHOD	RESULT	UNITS	REGULATORY LIMIT	DATE RUN	ANALYST
Arsenic '	SW-846 6010	<0.500	_mg/L	5.0	07/20/93	_JA
Barium	SW-846 6010	<0.220	_mg/L	100.0	07/19/93	_JP
Cadmium	SW-846 6010	<0.010	mg/L	1.0	07/19/93	_JP
Chromium	SW-846 6010	0.585	_mg/L	5.0	07/19/93	_JP
Lead	SW-846 6010	<0.500	mg/L	5.0	07/19/93	JP
Mercury	SW-846 7470	<0.008	mg/L	0.2	07/20/93	JA
Selenium	SW-846 6010	<0.500	mg/L	1.0	07/20/93	_JA
Silver	SW-846 7760	<0.050	_mg/L	5.0	07/20/93	_JA







222 CAVALCADE P.O. BOX 8768, HOUSTON, TEXAS 77249 \* 713 692-9151

Client DRESSER INDUSTRIES P. O. BOX 1430 ALEXANDRIA, LA 71309-1430 318/640-6245 FAX 640-6322

Attn: T.A. TURNER

Client No. 2\_1928\_00 Report No. 93-07-381 Report Date 09/02/93 10:18

Project MS0119287/TCLP ANALYSIS ABbres

Date Sampled 07/19/93

Sample Type SOLID SAMPLES

P.O. # 168222-6/REF MW036941

Lab No. 93-07-381-01 93-07-381-02 Sampled By CLIENT

Transported by <u>DELIVERY SERVICE</u>

Date Received 07/27/93

Sample Identification C/A 1364 SAMPLE #47 ~ C/A 1364 SAMPLE #48 -

SOUTHWESTERN LABORATORIES

HECTOR CORONADO

**DOCUMENT 4(B): 20 OF 31** 

NOW- HAZ. 11/30/93

Order # 93-07-381 09/02/93 10:18

TEST RESULTS BY SAMPLE

Client: DRESSER INDUSTRIES

Sample: 01A C/A 1364 SAMPLE #47 Collected: 07/19/93 06:00

				Detection	n Date	
Test Name	Method	Result	<u>Units</u>	Limit	Started	Analyst
IGNITABILITY, CLOSED-CUP	SW-846 1010	>210	deg. F		08/05/93	SPL
REACTIVITY CYANIDE	SW-846 7.3.3	<0.40	ppm	0.40	07/30/93	RC
REACTIVITY SULFIDE	SW-846 7.3.4	<20	ppm	20	07/29/93	SJ
TCLP PREP.	SW-846 1311	08/01/93	DATE		08/02/93	JH
рН	SW-846 9045	11.63	pH units		07/27/93	EU

Sample: 02A C/A 1364 SAMPLE #48 Collected: 07/19/93 06:00

				Detectio	n Date	
Test Name	Method	<u>Result</u>	<u>Units</u>	Limit	Started	<b>Analyst</b>
IGNITABILITY, CLOSED-CUP	SW-846 1010	>210	deg. F		08/05/93	SPL
REACTIVITY CYANIDE	SW-846 7.3.3	<0.40	ppm	0.40	07/30/93	RC
REACTIVITY SULFIDE	SW-846 7.3.4	<20	ppm	20	07/28/93	SJ
TCLP PREP.	SW-846 1311	08/01/93	DATE		08/02/93	JH
рH	SW-846 9045	11.92	pH units		07/27/93	EU

Order # 93-07-381 09/02/93 10:18

Client: DRESSER INDUSTRIES

TEST RESULTS BY SAMPLE

Sample Description: C/A 1364 SAMPLE #47

Test Description: TCLP METALS

Collected: 07/19/93 06:00

Lab No: 01A

Method: SW-846

Test Code: TCLP\_M

PARAMETER	METHOD	RESULT	UNITS	REGULATORY LIMIT	DATE RUN	ANALYST
Arsenic	SW-846 7060	<0.5	mg/L	5.0	08/03/93	_JA
Barium	_SN-846 6010	0.924	_mg/L	100.0	08/05/93	GLM
Cadmium	SW-846 6010	0.158	mg/L	1.0	08/05/93	GLM
Chromium	SW-846 6010	<0.05	mg/L	5.0	08/05/93	GLM
Lead	SW-846 6010	<0.5	mg/L	5.0	08/05/93	GLM
Mercury	SW-846 7470	<0.008	_mg/L	0.2	08/05/93	_ <u>JA</u>
Selenium	SW-846 7740	<0.5	mg/L	1.0	08/05/93	_JA
Silver	SW-846 7760	<u>&lt;0.05</u>	mg/L	5.0	08/03/93	_JA

Order # 93-07-381 09/02/93 10:18

Client: DRESSER INDUSTRIES

TEST RESULTS BY SAMPLE

Sample Description: C/A 1364 SAMPLE #48

Test Description: TCLP METALS

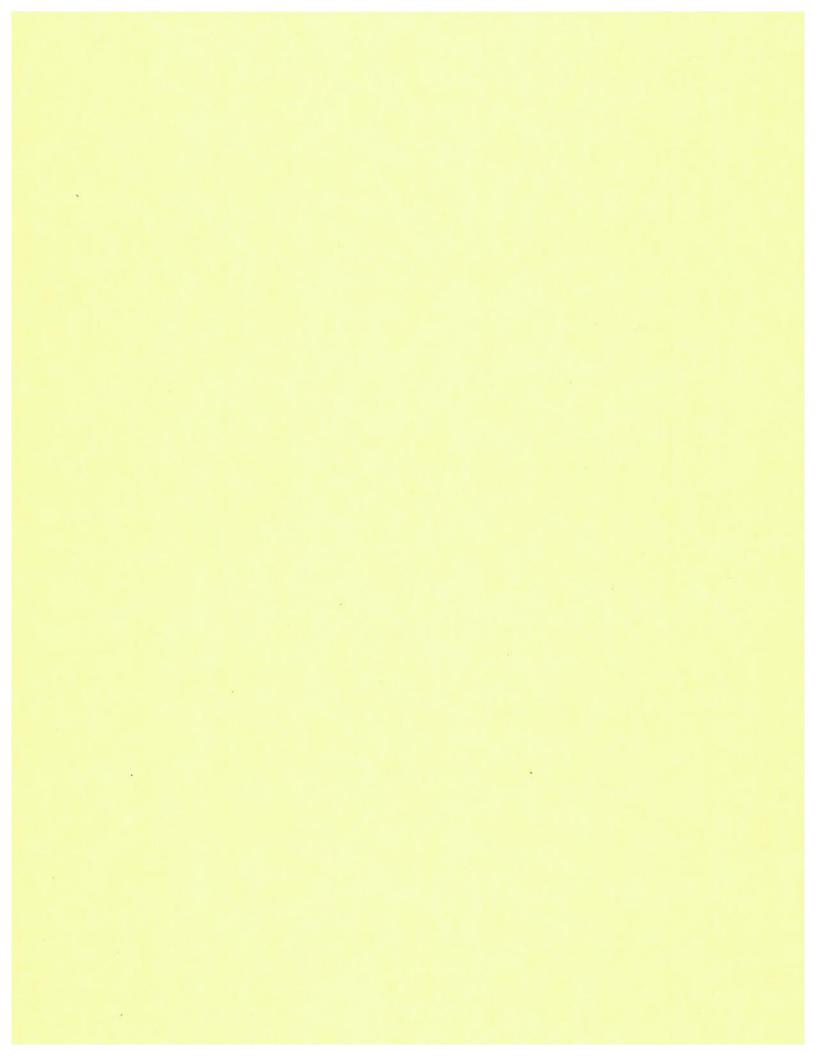
Collected: 07/19/93 06:00

Lab No: 02A

Method: SW-846

Test Code: TCLP\_M

PARAMETER	METHOD	RESULT	UNITS	REGULATORY LIMIT	DATE <u>Run</u>	ANALYST
Arsenic	SW-846 7060	<0.5	mg/L	5.0	08/03/93	JA
Barium	SW-846 6010	0.849	mg/L	100.0	08/05/93	GLM
Cadmium	SW-846 6010	<0.01	mg/L	1.0	08/05/93	GLM
Chromium	SW-846 6010	0.246	mg/L	5.0	08/05/93	GLM
Lead	SW-846 6010	<0.5	mg/L	5.0	08/05/93	GLM
Mercury	SW-846 7470	<0.008	_mg/L	0.2	08/05/93	JA
Selenium	SW-846 7740	<0.5	mg/L	1.0	08/05/93	_JA
Silver	SW-846 7760	<0.05	mg/L	5.0	08/03/93	_JA







222 CAVALCADE \* P.O. BOX 8768, HOUSTON, TEXAS 77249 \* 713 692-9151

Client DRESSER INDUSTRIES

P. O. BOX 1430

ALEXANDRIA, LA 71309-1430 318/640-6245 FAX 640-6322

Attn: T.A. TURNER

Client No. 2\_1928\_00 Report No. 93-07-382 Report Date 08/10/93 12:33

Project MS0119287/TCLP ANALYSIS AShes

Date Sampled <u>07/26/93</u>

Sample Type SOLID SAMPLES

P.O. # 968222-6/REF MW036941

Lab No. 93-07-382-01 93-07-382-02 Sampled By CLIENT

Transported by <u>DELIVERY SERVICE</u>

Date Received 07/27/93

Sample Identification

C/A 1364 SAMPLE #49 / C/A 1364 SAMPLE #50 /

SOUTHWESTERN LABORATORIES

HECTOR CORONADO

XC: EJ Mason AD

NON - HAZ 11 30/93

DOCUMENT 4(B): 21 OF 31

Order # 93-07-382 08/10/93 12:33

Client: DRESSER INDUSTRIES

TEST RESULTS BY SAMPLE

Sample: 01A C/A 1364 SAMPLE #49

Collected: 07/26/93 06:00

<u>Test Name</u>				Detection	on Date	
IGNITABILITY, CLOSED-CUP	Method SU-844 1010	Result		Limit	Started	Analyst
REACTIVITY CYANIDE	SW-846 1010 SW-846 7.3.3		deg. F		08/05/93	SPL
REACTIVITY SULFIDE	SW-846 7.3.4	<0.40		0.40	07/30/93	RC
TCLP PREP.	SW-846 1311	<20	ppm	20	07/29/93	SJ
РН	SW-846 9045	10.000			08/02/93	JH
	OH 040 9045	10.94	pH units		07/27/93	FII

Sample: 02A C/A 1364 SAMPLE #50

Collected: 07/26/93 06:00

Test Name				Detection	n Date	
IGNITABILITY, CLOSED-CUP	Method		<u>Units</u>	Limit	Started	Analyst
REACTIVITY CYANIDE	SW-846 1010		deg. F		08/05/93	
REACTIVITY SULFIDE	SW-846 7.3.3	<0.40	ppm		07/30/93	
TCLP PREP.	SW-846 7.3.4		ppm		07/29/93	
pH	SW-846 1311	08/01/93	DATE		08/02/93	JH
	SW-846 9045	11.16	pH units		07/27/93	FU

Order # 93-07-382 08/10/93 12:33

Client: DRESSER INDUSTRIES

TEST RESULTS BY SAMPLE

Sample Description: C/A 1364 SAMPLE #49

Test Description: TCLP METALS Collected: 07/26/93 06:00 Lab No: 01A

Method: SW-846

Test Code: TCLP\_M

PARAMETER	METHOD	RESULT	UNITS	REGULATORY LIMIT	DATE <u>Run</u>	ANALYST
Arsenic	SW-846 7060	<0.5	mg/L	5.0	08/03/93	_JA
Barium	_SW-846_6010	0.506	mg/L	100.0	08/05/93	GLM
Cadmium	SW-846 6010	<0.01	_mg/L	1.0	08/05/93	GLM
Chromium	SW-846 6010	<0.05	_mg/L	5.0	08/05/93	GLM
Lead	SW-846 6010	<0.5	mg/L	5.0	08/05/93	GLM
Mercury	SW-846 7470	<0.008	mg/L	0.2	08/05/93	_JA
Selenium	SW-846 7740	<0.5	_mg/L	1.0	08/05/93	_JA
Silver	SW-846 7760	<0.05	mg/L	5.0	08/03/93	JA

Order # 93-07-382 08/10/93 12:33

Client: DRESSER INDUSTRIES

TEST RESULTS BY SAMPLE

Sample Description: C/A 1364 SAMPLE #50

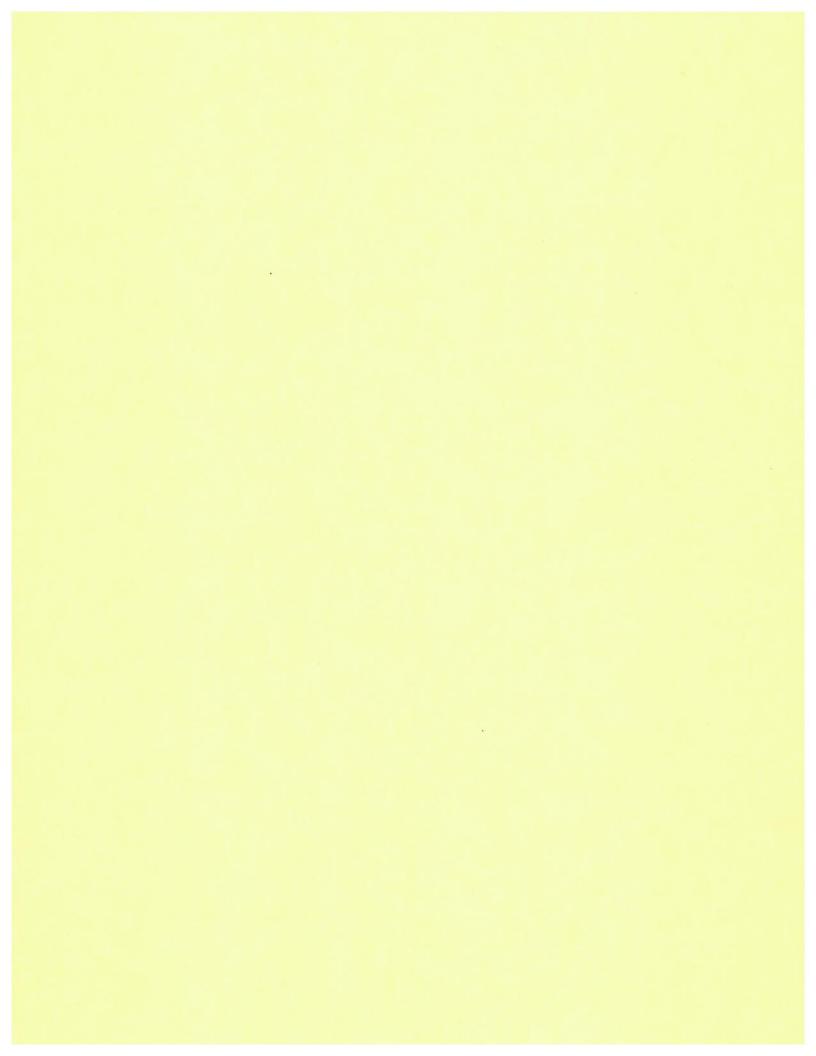
Test Description: TCLP METALS Collected: 07/26/93 06:00

Lab No: OZA

Method: SW-846

Test Code: TCLP\_M

PARAMETER	METHOD	RESULT	UNITS	REGULATORY LIMIT	DATE RUN	ANALYST
Arsenic	SW-846 7060	<0.5	_mg/L	5.0	08/03/93	
Barium	SW-846 6010	0.425	0	200	50/05/75	_ <u>JA</u>
Cadmium			_mg/L	100.0	08/05/93	GLM
cadill um	SW-846 6010	<0.01	mg/L	1.0	08/05/93	GLM
Chromium .	SW-846 6010	<0.05	_mg/L	5.0	08/05/93	
Lead	SW-846 6010	0.500			00/03/43	GLM
122		0.500	_mg/L	5.0	08/05/93	GLM
Mercury	SW-846 7470	<0.008	mg/L	0.2	08/05/93	_JA
Selenium	SW-846 7740	<u>&lt;0.5</u>	mg/L	1.0	08/05/93	
Silver	SW-846 7760	<0.05	:000044			_5/4
			mg/L	5.0	08/03/93	_JA







222 CAVALCADE \* P.O. BOX 8768, HOUSTON, TEXAS 77249 \* 713 692-9151

Client DRESSER INDUSTRIES

P. O. BOX 1430

ALEXANDRIA, LA 71309-1430 318/640-6245 FAX 640-6322

Attn: TERRY TURNER

Client No. 2\_1928\_00 Report No. 93-08-061 Report Date 08/19/93 13:51

Project MSO 119287/TCLP ANALYSIS

asker

Date Sampled <u>08/02/93</u>

Sample Type SOLID SAMPLES

P.O. # 168222-6/MWO 36941

<u>Lab No.</u> 93-08-061-01 93-08-061-02 Sampled By CLIENT

Transported by DELIVERY SERVICE

Date Received 08/04/93

Sample Identification

C/A 1364 SAMPLE NO 51 / C/A 1364 SAMPLE NO 52

SOUTHWESTERN LABORATORIES

HECTOR CORONADO

xe: 121;

DOCUMENT 4(B): 22 OF 31

Order # 93-08-061 08/19/93 13:51

TEST RESULTS BY SAMPLE

Client: DRESSER INDUSTRIES

Sample: 01A C/A 1364 SAMPLE NO 51 Collected: 08/02/93 06:00

				Detectio	Detection Date		
Test Name	Method	Result	<u>Units</u>	Limit	Started	Analyst	
IGNITABILITY, CLOSED-CUP	SW-846 1010	>210	deg. F		08/10/93	SPL	
REACTIVITY CYANIDE	SW-846 7.3.3	<0.40	ppm	0.40	08/13/93	RC	
REACTIVITY SULFIDE	SW-846 7.3.4	20.9	ppm	20	08/06/93	SJ	
TCLP PREP.	SW-846 1311	08/11/93	DATE		08/12/93	ЈН	
рН	SW-846 9045	12.02	pH units		08/03/93		

Sample: 02A C/A 1364 SAMPLE NO 52 Collected: 08/02/93 06:00

			<u>Detection</u> <u>Date</u>			
Test Name	Method	Result	<u>Units</u>	Limit	Started	Analyst
IGNITABILITY, CLOSED-CUP	SW-846 1010	>210	deg. F		08/10/93	SPL
REACTIVITY CYANIDE	SW-846 7.3.3	<0.40	ppm	0.40	08/13/93	RC
REACTIVITY SULFIDE	SW-846 7.3.4	<20	ppm	20	08/06/93	SJ
TCLP PREP.	SW-846 1311	08/11/93	DATE	•	08/12/93	JH
рН	SW-846 9045	12.08	pH units		08/03/93	EU

Order # 93-08-061 08/19/93 13:51

Client: DRESSER INDUSTRIES

TEST RESULTS BY SAMPLE

Sample Description: C/A 1364 SAMPLE NO 51

Test Description: TCLP METALS

Lab No: 01A

Method: SW-846

Test Code: TCLP\_M

Collected: 08/02/93 06:00

PARAMETER	METHOD	RESULT	UNITS	REGULATORY LIMIT	DATE RUN	ANALYST
Arsenic	_SW-846_6010	<0.5	_mg/L	5.0	08/18/93	GLM
Barium	_SW-846 6010	<0.22	_mg/L	100.0	08/18/93	GLM
Cadmium	SW-846 6010	<0.01	mg/L	1.0	08/18/93	GLM
Chromium	SW-846 6010	<0.05	_mg/L	5.0	08/18/93	GLM
Lead	SW-846 6010	<0.5	mg/L	5.0	08/18/93	GLM
Mercury	SW-846 7470	<0.008	_mg/L	0.2	08/18/93	_JA
Selenium	SW-846 6010	<0.5	mg/L	1.0	08/18/93	GLM
Silver	SW-846 7760	<0.05	mg/L	5.0	08/17/93	<u>_JP</u>

Order # 93-08-061 08/19/93 13:51

Client: DRESSER INDUSTRIES

TEST RESULTS BY SAMPLE

Sample Description: C/A 1364 SAMPLE NO 52

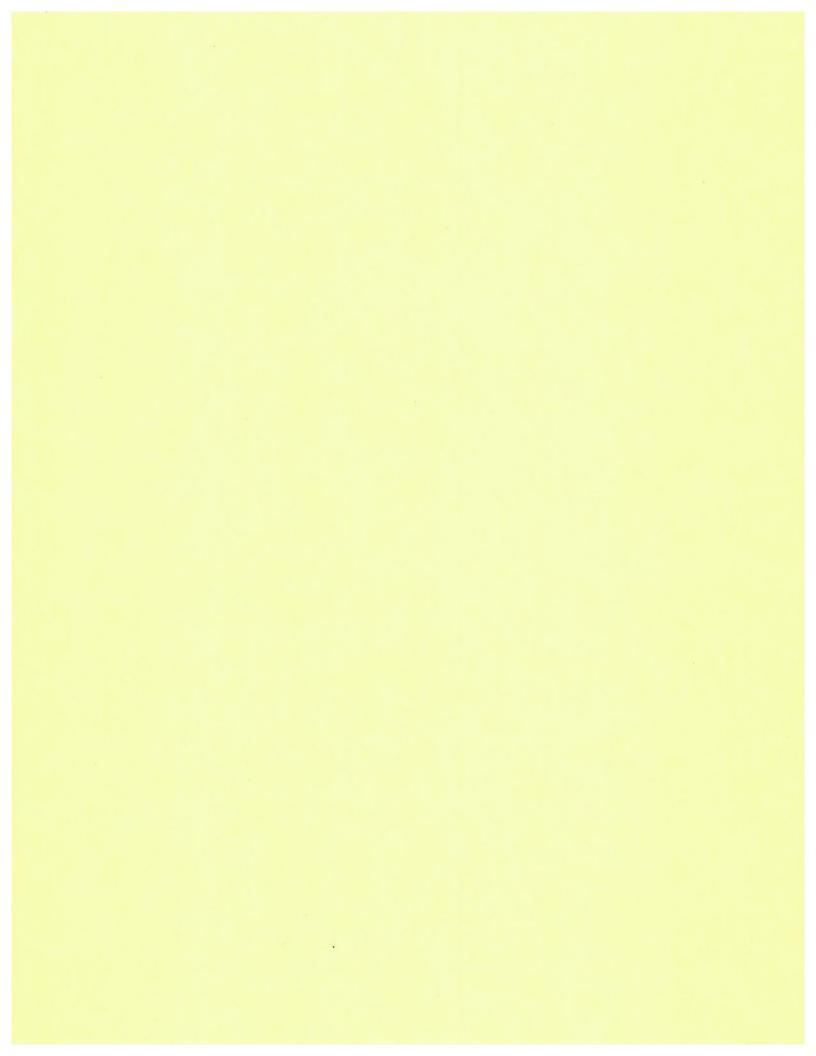
Test Description: TCLP METALS Collected: 08/02/93 06:00

Lab No: 02A

Method: SW-846

Test Code: TCLP\_M

PARAMETER	METHOD	RESULT	UNITS	REGULATORY LIMIT	DATE RUN	ANALYST
Arsenic	SW-846 6010	<0.5	_mg/L	5.0	08/18/93	GLM
Barium	SW-846 6010	0.634	_mg/L	100.0	08/18/93	GLM
Cadmium	SW-846 6010	<0.01	_mg/L	1.0	08/18/93	GLM
Chromium	SW-846 6010	<0.05	mg/L	5.0	08/18/93	GLM
Lead	_SW-846 6010	<0.5	_mg/L	5.0	08/18/93	GLM
Mercury	SW-846 7470	<0.008	mg/L	0.2	08/18/93	JA
Selenium	SW-846 6010	<0.5	mg/L	1.0	08/18/93	GLM
Silver	SW-846 7760	<0.05	_mg/L	5.0	08/17/93	JP





222 CAVALCADE \* P.O. BOX 8768, HOUSTON, TEXAS 77249 \* 713 692-9151

Client DRESSER INDUSTRIES

P. O. BOX 1430

ALEXANDRIA, LA 71309-1430 318/640-6245 FAX 640-6322

Attn: TERRY TURNER

Project MSO #119287/TCLP ANALYSIS

Date Sampled 08/09/93

Sample Type SOLID SAMPLES

P.O. # 168222-6/MWO 36941

<u>Lab No.</u> 93-08-146-01 93-08-146-02 Sampled By CLIENT

Transported by <u>DELIVERY SERVICE</u>

Date Received 08/10/93

Sample Identification

C/A1364/SAMPLE NO. 53

C/A1364 Sample no. 54

SOUTHWESTERN LABORATORIES

Client No. 2\_1928\_00

Report No. 93-08-146

Report Date 08/30/93 14:39

HECTOR CORONADO

Xei ES M. AONALD 12/15/93

**DOCUMENT 4(B): 23 OF 31** 

Order # 93-08-146 08/30/93 14:39

TEST RESULTS BY SAMPLE

Client: DRESSER INDUSTRIES

Sample: 01A C/A1364/SAMPLE NO. 53 Collected: 08/09/93 06:00

Test Name	100 700 20			Detection	n <u>Date</u>	
	Method	<u>Result</u>	<u>Units</u>	Limit	Started	Analyst
IGNITABILITY, CLOSED-CUP	SW-846 1010	>210	deg. F		08/20/93	
REACTIVITY CYANIDE	SW-846 7.3.3	<0.40	ppm	0.40	08/13/93	RC
REACTIVITY SULFIDE	SW-846 7.3.4	27	ppm	20	08/12/93	
TCLP PREP.	SW-846 1311	08/15/93	DATE		08/16/93	
рн	SW-846 9045	11.25	pH units			EU

Sample: 02A C/A1364

Collected: 08/09/93 06:00

Test Name		Detection	ction Date			
	Method	Result	<u>Units</u>	Limit	Started	Analyst
IGNITABILITY, CLOSED-CUP	SW-846 1010	>210	deg. F		08/20/93	SPL
REACTIVITY CYANIDE	SW-846 7.3.3	<0.40	ppm	0.40	08/13/93	RC
REACTIVITY SULFIDE	SW-846 7.3.4	26	ppm	20	08/12/93	SJ
TCLP PREP.	SW-846 1311	08/15/93	DATE		08/16/93	JH
РH	SW-846 9045	11.76	pH units		08/10/93	EU

Order # 93-08-146 08/30/93 14:39

Sample Description: C/A1364/SAMPLE NO. 53

Test Description: TCLP METALS

Collected: 08/09/93 06:00

Lab No: 01A

Method: SW-846

Test Code: TCLP\_M

PARAMETER	METHOD	RESULT	UNITS	REGULATORY LIMIT	DATE <u>Run</u>	ANALYST
Arsenic	SW-846 6010	<0.5	_mg/L	5.0	08/18/93	GLM
Barium	SW-846 6010	1.03	_mg/L	100.0	08/18/93	GLM
Cadmium	SW-846 6010	<0.01	mg/L	1.0	08/18/93	GLM
Chromium	SW-846 6010	<0.05	_mg/L	5.0	08/18/93	GLM
Lead	SW-846 6010	<0.5	mg/L	5.0	08/18/93	GLM
Mercury	SW-846 7470	<0.008	mg/L	0.2	08/18/93	_JA
Selenium	SW-846 6010	<0.5	mg/L	1.0	08/18/93	GLM
Silver	SW-846 7760	<0.05	mg/L	5.0	08/17/93	_JP

Order # 93-08-146 08/30/93 14:39

Client: DRESSER INDUSTRIES

TEST RESULTS BY SAMPLE

Sample Description: C/A1364

Test Description: TCLP METALS

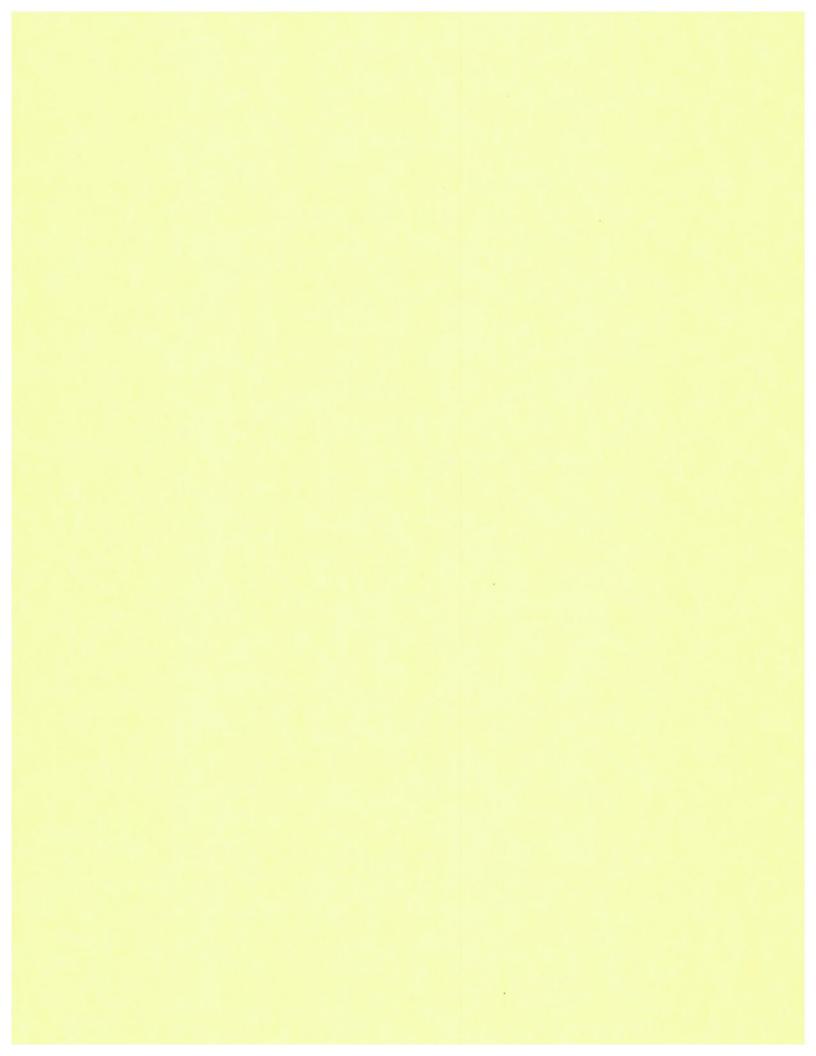
Collected: 08/09/93 06:00

Lab No: 02A

Method: SW-846

Test Code: TCLP\_M

PARAMETER	METHOD	RESULT	UNITS	REGULATORY <u>LIMIT</u>	DATE RUN	ANALYST
Arsenic	SW-846 6010	<0.5	_mg/L	5.0	08/18/93	GLM
Barium	SW-846 6010	0.771	mg/L	100.0	08/18/93	GLM
Cadmium	SW-846 6010	<0.01	mg/L	1.0	08/18/93	GLM
Chromium	SW-846 6010	<0.05	_mg/L	5.0	08/18/93	GLM
Lead	SW-846 6010	<0.5	mg/L	5.0	08/18/93	GLM
Mercury	SW-846 7470	<0.008	_mg/L	0.2	08/18/93	JA
Selenium	SW-846 6010	<u>&lt;0.5</u>	mg/L	1.0	08/18/93	GLM
Silver	SW-846 7760	<0.05	mg/L	5.0	08/17/93	_JP





222 CAVALCADE P.O. BOX 8768, HOUSTON, TEXAS 77249 713 692-9151

Client DRESSER INDUSTRIES

P. O. BOX 1430

ALEXANDRIA, LA 71309-1430 318/640-6245 FAX 640-6322

Attn: TERRY TURNER

Client No. 2\_1928 00 Report No. 93-08-268 Report Date 08/30/93 12:07

Project MSO# 119287/TCLP-RCI ANALSIS AS hes

Date Sampled <u>08/16/93</u>

Sample Type SOLID SAMPLES

P.O. # 168222-6/MWO 36941

Reviewed By

Lab No. 93-08-268-01 93-08-268-02 Sampled By CLIENT

Transported by <u>DELIVERY SERVICE</u>

Date Received 08/18/93

Sample Identification

C/A 1364 NO. 55

C/A 1364 NO. 56

SOUTHWESTERN LABORATORIES

HECTOR CORONADO

**DOCUMENT 4(B): 24 OF 31** 

Cleared Dupins Non-Haz. MMWO 41185 11/22/93

Order # 93-08-268 08/30/93 12:07

Client: DRESSER INDUSTRIES

TEST RESULTS BY SAMPLE

Sample: 01A C/A 1364 NO. 55 Collected: 08/16/93 06:00

		<u>Detection</u> <u>Date</u>				
Test Name	Method	<u>Result</u>	<u>Units</u>	Limit		Analyst
IGNITABILITY, CLOSED-CUP	SW-846 1010	>210	deg. F		08/23/93	
REACTIVITY CYANIDE	SW-846 7.3.3	<0.40	ppm	0.40	08/20/93	
REACTIVITY SULFIDE	SW-846 7.3.4	<20	ppm		08/20/93	
TCLP PREP.	SW-846 1311	08/23/93	DATE		08/24/93	JH
рН	SW-846 9045	10.73	pH units		08/18/93	

Sample: 02A C/A 1364 NO. 56

Collected: 08/16/93 06:00

				Detection	n Date	
Test Name	<u>Method</u>	<u>Result</u>	<u>Units</u>	Limit	Started	Analyst
IGNITABILITY, CLOSED-CUP	SW-846 1010	>210	deg. F		08/23/93	
REACTIVITY CYANIDE	SW-846 7.3.3	<0.40	ppm	0.40	08/20/93	
REACTIVITY SULFIDE	SW-846 7.3.4	<20	ppm	20	08/20/93	
TCLP PREP.	SW-846 1311	08/23/93	DATE		08/24/93	N. Carlotte
₽Ħ	SW-846 9045	10.86	pH units		08/18/93	

Order # 93-08-268 08/30/93 12:07

Client: DRESSER INDUSTRIES

TEST RESULTS BY SAMPLE

Sample Description: C/A 1364 NO. 55

Test Description: TCLP METALS

Collected: 08/16/93 06:00

Lab No: 01A

Method: SW-846

Test Code: TCLP\_M

PARAMETER	METHOD	RESULT	UNITS	REGULATORY LIMIT	DATE RUN	ANALYST
Arsenic	SW-846 6010	<0.5	_mg/L	5.0	08/25/93	GLM
Barium	SN-846 6010	0_934	mg/L	100.0	08/25/93	GLM
Cadmium	SW-846 6010	<0.01	mg/L	1.0	08/25/93	GLM
Chromium	SW-846 6010	0.912	mg/L	5.0	08/25/93	GLM
Lead	SW-846 6010	<0.5	mg/L	5.0	08/25/93	GLM
Mercury	SW-846 7470	<0.008	mg/L	0.2	08/25/93	JA
Selenium	SW-846 6010	<0.5	mg/L	1.0	08/25/93	GLM
Silver	SW-846 7760	0.075	mg/L	5.0	08/25/93	GLM

Order # 93-08-268 08/30/93 12:07

Client: DRESSER INDUSTRIES

30/93 12:07 TEST RESULTS BY SAMPLE

ample Description: C/A 1364 NO. 56

Test Description: TCLP METALS

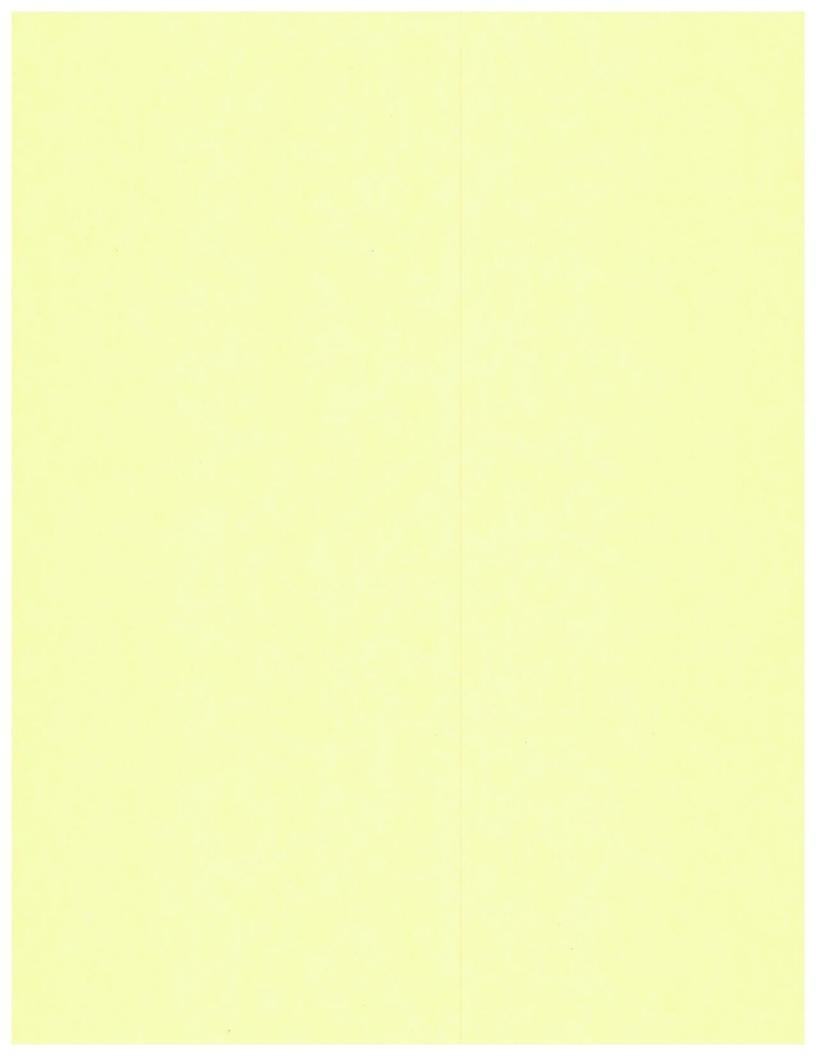
Collected: 08/16/93 06:00

Lab No: 02A

Method: SW-846

Test Code: TCLP\_M

PARAMETER	METHOD	RESULT	UNITS	REGULATORY LIMIT	DATE <u>Run</u>	ANALYST
Arsenic	SW-846 6010	<0.5	_mg/L	5.0	08/25/93	GLM
Barium	SW-846 6010	0.800	mg/L	100.0	08/25/93	GLM
Cadmium	SW-846 6010	0.088	_mg/L	1.0	08/25/93	GLM
Chromium	SW-846 6010	<0.05	_mg/L	5.0	08/25/93	GLM
Lead	SW-846 6010	<0.5	mg/L	5.0	08/25/93	GLM
Mercury	SW-846 7470	<0.008	mg/L	0.2	08/25/93	_JA
Selenium	SW-846 6010	<0.5	mg/L	1.0	08/25/93	GLM
Silver	SW-846 7760	0.072	_mg/L	5.0	08/25/93	GLM







222 CAVALCADE \* P.O. BOX 8768, HOUSTON, TEXAS 77249 \* 713 692-9151

Client DRESSER INDUSTRIES

P. O. BOX 1430

ALEXANDRIA, LA 71309-1430

318/640-6245 FAX 640-6322

Attn: TERRY TURNER

Client No. 2\_1928\_00 Report No. 93-08-350 Report Date 09/03/93 15:02

Project MSO #119287/ASHES ANALYSIS

Date Sampled 08/23/93

Sample Type SOLID SAMPLES

P.O. # 168222-6/MWO 36941

Lab No. 93-08-350-01 93-08-350-02 Sampled By CLIENT

Transported by <u>DELIVERY SERVICE</u>

Date Received 08/24/93

Sample Identification

C/A 1364 SAMPLE NO.57 C/A 1364 SAMPLE NO.58 -

SOUTHWESTERN LABORATORIES

Reviewed By

HECTOR CORONADO

xe: E) M. DONAID

DOCUMENT 4(B): 25 OF

Order # 93-08-350 09/03/93 15:02

Client: DRESSER INDUSTRIES

TEST RESULTS BY SAMPLE

Sample: 01A C/A 1364 SAMPLE NO.57

Collected: 08/23/93 06:00

Took Name				Detection	n Date	
Test Name	Method	<u>Result</u>	<u>Units</u>	Limit	Started	Analyst
IGNITABILITY, CLOSED-CUP	SW-846 1010	>210	deg. F		08/31/93	
REACTIVITY CYANIDE	SW-846 7.3.3	<0.40	ppm	0.40	08/27/93	
REACTIVITY SULFIDE	SW-846 7.3.4	<20	ppm	20	08/24/93	
TCLP PREP.	SW-846 1311	08/25/93	DATE	A	08/26/93	
PH	SW-846 9045	11.30	pH units		08/24/93	10202

Sample: 02A C/A 1364 SAMPLE NO.58

Collected: 08/23/93 06:00

Test Name				Detection	n Date	
	Method	<u>Result</u>	<u>Units</u>	Limit	Started	Analyst
IGNITABILITY, CLOSED-CUP	SW-846 1010	>210	deg. F	_	08/31/93	
REACTIVITY CYANIDE	SW-846 7.3.3	<0.40	DOM	0.40	and the second second	Ve11.55
REACTIVITY SULFIDE	SW-846 7.3.4	37.2	V-0.5-1		A CONTRACTOR OF COMME	
TCLP PREP.	SW-846 1311	08/25/93	• •	20	08/24/93	100000
pH			DATE		08/26/93	JH
r"	SW-846 9045	11.05	pH units.		08/24/93	EU

Order # 93-08-350 09/03/93 15:02

Client: DRESSER INDUSTRIES

TEST RESULTS BY SAMPLE

ample Description: C/A 1364 SAMPLE NO.57

Test Description: TCLP METALS

Lab No: 01A

Method: SW-846

Test Code: TCLP\_M

Collected: 08/23/93 06:00

PARAMETER	METHOD	RESULT	UNITS	REGULATORY LIMIT	DATE RUN	ANALYST
Arsenic	SW-846 6010	<u>&lt;0.5</u>	_mg/L	5.0	09/01/93	GLM
Barium	SW-846 6010	0.756	_mg/L	100.0	08/31/93	GLM
Cadmium	SW-846 7130	<0.01	_mg/L	1.0	08/31/93	GLM
Chromium	_SW-846 7190	<0.05	mg/L	5.0	08/31/93	GLM
Lead	SW-846 7420	<0.5	_mg/L	5.0	08/31/93	GLM
Mercury	SW-846 7470	<0.008	mg/L	0.2	09/01/93	JP
Selenium	SW-846 6010	<0.5	mg/L	1.0	09/01/93	<u>GLM</u>
Silver	SW-846 7760	<0.05	mg/L	5.0	08/30/93	<u>GLM</u>

Order # 93-08-350 09/03/93 15:02

Client: DRESSER INDUSTRIES

TEST RESULTS BY SAMPLE

ample Description: C/A 1364 SAMPLE NO.58

Test Description: TCLP METALS

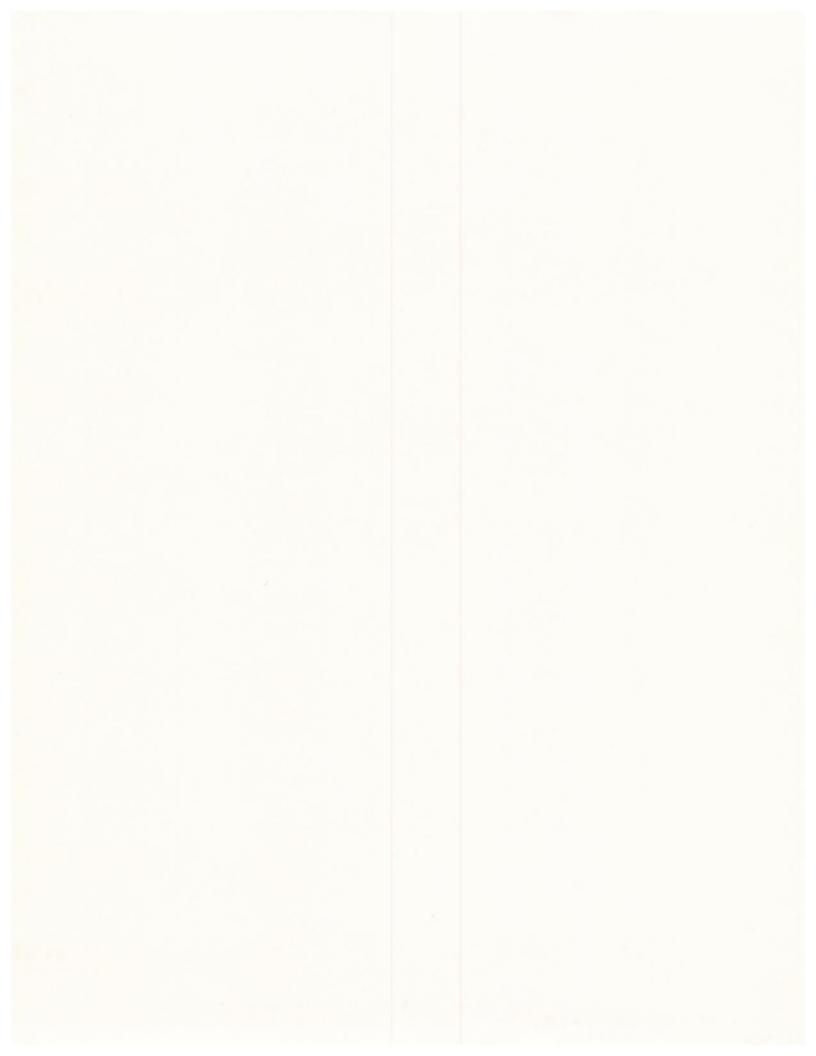
Collected: 08/23/93 06:00

Lab No: 02A

Method: SW-846

Test Code: TCLP\_M

PARAMETER	METHOD	RESULT	UNITS	REGULATORY LIMIT	DATE RUN	ANALYST
Arsenic	SW-846 6010	<0.5	mg/L	5.0	09/01/93	GLM
Barium	SW-846 6010	0.914	mg/L	100.0	08/31/93	GLM
Cadmium	SW-846 7130	0.121	_mg/L	1.0	08/31/93	GLM
Chromium	SW-846 7190	<0.05	_mg/L	5.0	08/31/93	GLM
Lead	SW-846 7420	<0.5	_mg/L	5.0	08/31/93	GLM
Mercury	SW-846 7470	<0.008	_mg/L	0.2	09/01/93	<u>JP</u>
Selenium	SW-846 6010	<0.5	mg/L	1.0	09/01/93	GLM
Silver	SW-846 7760	<u> &lt;0.05</u>	mg/L	5.0	08/30/93	GLM





222 CAVALCADE \* P.O. BOX 8768, HOUSTON, TEXAS 77249

Client No. 2\_1928 00

Report No. 93-09-032

Report Date 09/17/93 12:31

Client DRESSER INDUSTRIES

P. O. BOX 1430

ALEXANDRIA, LA 71309-1430

318/640-6245 FAX 640-6322

Attn: T.A. TURNER

Project MSO #120105/ASHES ANALYSIS

Date Sampled <u>08/30/93</u>

Sample Type SOLID SAMPLES

P.O. # 168222-6/MWO #36941

Lab No. 93-09-032-01

93-09-032-02

Sampled By CLIENT

Transported by <u>DELIVERY SERVICE</u>

Date Received 09/02/93

Sample Identification

C/A 1364 SAMPLE #59

C/A 1364 SAMPLE #60

SOUTHWESTERN LABORATORIES

HECTOR CORONADO

Xe: IN,

**DOCUMENT 4(B): 26 OF 31** 

Order # 93-09-032 09/17/93 12:31

Client: DRESSER INDUSTRIES

TEST RESULTS BY SAMPLE

Sample: 01A C/A 1364 SAMPLE #59

Collected: 08/30/93 06:00

<u>Iest Name</u>	2651 (2 15			Detection	n Date	
IGNITABILITY, CLOSED-CUP	Method	<u>Result</u>	<u>Units</u>	Limit	Started	Analyst
REACTIVITY CYANIDE	SW-846 1010		deg. F		09/14/93	
REACTIVITY SULFIDE	SW-846 7.3.3	<0.40	ppm	0.40	09/07/93	RC
TCLP PREP.	SW-846 7.3.4	41	ppm	20	09/03/93	JD
Н	SW-846 1311	09/13/93	DATE		09/13/93	JH
•	SW-846 9045	11.68	pH units		09/02/93	FII

Sample: 02A C/A 1364 SAMPLE #60

Collected: 08/30/93 06:00

Test Name				Detection	n Date	
IGNITABILITY, CLOSED-CUP	Method	Result	<u>Units</u>	Limit		Analyst
REACTIVITY CYANIDE	SW-846 1010		deg. F		09/14/93	
REACTIVITY SULFIDE	SW-846 7.3.3	<0.40	ppm		09/07/93	
TCLP PREP.	SW-846 7.3.4		ppm	20	09/03/93	JD
pH	SW-846 1311	09/13/93			09/13/93	JH
	SW-846 9045	11.09	pH units		09/02/93	EU

Order # 93-09-032 09/17/93 12:31

Client: DRESSER INDUSTRIES

#### TEST RESULTS BY SAMPLE

Jample Description: C/A 1364 SAMPLE #59

Test Description: TCLP METALS

Collected: 08/30/93 06:00

Lab No: 01A

Method: SW-846

Test Code: TCLP\_M

### TCLP METALS

PARAMETER	METHOD	RESULT	UNITS	REGULATORY LIMIT	DATE RUN	ANALYST
Arsenic	SW-846 7060	<0.5	mg/L	5.0	09/16/93	_JA
Barium	SW-846 7080	<0.22	mg/L	100.0	09/14/93	GLM
Cadmium	SW-846 7130	0.017	_mg/L	1.0	09/14/93	GLM
Chromium	SW-846 7190	<0.05	mg/L	5.0	09/14/93	GLM
Lead	SW-846 7420	<0.5	mg/L	5.0	09/14/93	GLM
Mercury	SW-846 7470	<0.008	_mg/L	0.2	09/15/93	 _JA
Selenium	SW-846 7740	<0.5	_mg/L	1.0	09/16/93	JA
Silver	SW-846 7760	<0.05	_mg/L	5.0	09/14/93	GLM
						<u>sen</u>

Page 3

Order # 93-09-032 09/17/93 12:31

Client: DRESSER INDUSTRIES

TEST RESULTS BY SAMPLE

Sample Description: C/A 1364 SAMPLE #60

Test Description: TCLP METALS

Method: SW-846

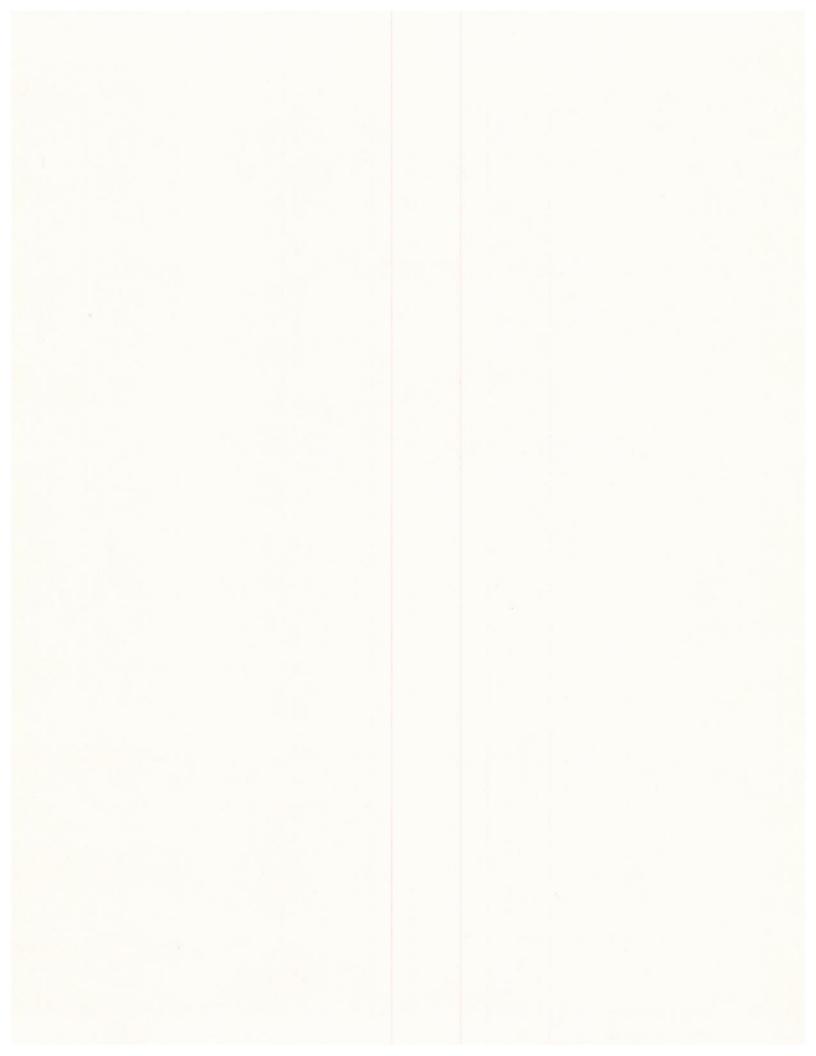
Collected: 08/30/93 06:00

Lab No: 02A

4

Test Code: TCLP\_M

PARAMETER	METHOD	RESULT	UNITS	REGULATORY LIMIT	DATE <u>Run</u>	ANALYST
Arsenic	SW-846 7060	<0.5	_mg/L	5.0	09/16/93	_JA
Barium	SW-846 7080	<0.22	mg/L	100.0	09/14/93	GLM
Cadmium	SW-846 7130	<0.01	mg/L	1.0	09/14/93	GLM
Chromium	SW-846 7190	<0.05	mg/L	5.0	09/14/93	GLM
Lead	SW-846 7420	<0.5	mg/L	5.0	09/14/93	GLM
Mercury	SW-846 7470	<0.008	_mg/L	0.2	09/15/93	_JA
Selenium	_SW-846 7740	<0.5	mg/L	1.0	09/16/93	
Silver	SW-846 7760	<0.05	mg/L	5.0	09/14/93	GLM







222 CAVALCADE \* P.O. BOX 8768, HOUSTON, TEXAS 77249 \* 713 692-9151

Client DRESSER INDUSTRIES P. O. BOX 1430

> ALEXANDRIA, LA 71309-1430 318/640-6245 FAX 640-6322

Attn: TERRY TURNER

Client No. 2\_1928 00 Report No. 93-09-205 Report Date 09/27/93 10:19

Project MSO# 120129/ASHES ANALYSIS

Alhes

Date Sampled <u>09/07/93</u> <u>09/13/93</u>

Sample Type SOLID SAMPLES

P.O. # 168734-6/MWO #38890

Sampled By CLIENT

Transported by <u>DELIVERY SERVICE</u>

Date Received 09/15/93

Lab No.

93-09-205-01

93-09-205-02

93-09-205-03

93-09-205-04

Sample Identification

C/A 1364 SAMPLE #61 -

C/A 1364 SAMPLE #62 -

C/A 1364 SAMPLE #63-

C/A 1364 SAMPLE #64

SOUTHWESTERN LABORATORIES

HECTOR CORONADO

DOCUMENT 4(B): 27 OF 31

Order # 93-09-205 09/27/93 10:19

Client: DRESSER INDUSTRIES

TEST RESULTS BY SAMPLE

Sample: 01A C/A 1364 SAMPLE #61 Collected: 09/07/93 06:00

Test Name

TCLP PREP.

Method

Result Units SW-846 1311 09/20/93 DATE

Detection Date

<u>Limit Started Analyst</u>

09/20/93 JH

Sample: 02A C/A 1364 SAMPLE #62

Collected: 09/07/93 06:00

Test Name

TCLP PREP.

Method SW-846 1311

Result Units 09/20/93 DATE

<u>Detection</u> <u>Date</u>

Limit Started Analyst

09/20/93 JH

Sample: 03A C/A 1364 SAMPLE #63

Collected: 09/13/93 09:00

Test Name

TCLP PREP.

Method

Result Units SW-846 1311 09/20/93 DATE

<u>Detection</u> <u>Date</u>

<u>Limit</u> <u>Started</u> <u>Analyst</u>

09/20/93 JH

Sample: 04A C/A 1364 SAMPLE #64

Collected: 09/13/93 09:00

Test Name

TCLP PREP.

Method

Result Units SW-846 1311 09/20/93 DATE

<u>Detection</u> <u>Date</u>

<u>Limit</u> <u>Started</u> <u>Analyst</u>

09/20/93 JH

Order # 93-09-205 09/27/93 10:19

Client: DRESSER INDUSTRIES

TEST RESULTS BY SAMPLE

Sample Description: C/A 1364 SAMPLE #61

Test Description: TCLP METALS

Collected: 09/07/93 06:00

Lab No: 01A

Method: SW-846

Test Code: TCLP\_M

PARAMETER	MET HOD	RESULT	UNITS	REGULATORY LIMIT	DATE RUN	ANALYST
Arsenic	_SW-846_6010	<0.5	_mg/L	5.0	09/24/93	<u>GLM</u>
Barium	SW-846 6010	0.860	_mg/L	100.0	09/24/93	<u>GLM</u>
Cadmium	SW-846 7130	0.023	mg/L	1.0	09/23/93	_JP
Chromium	SW-846 7190	0.118	mg/L	5.0	09/23/93	JP
Lead	SW-846 6010	<0.5	mg/L	5.0	09/24/93	JA
Mercury	SW-846 7470	<0.008	mg/L	0.2	09/22/93	_JA
Selenium	SW-846 6010	<0.5	_mg/L	1.0	09/24/93	GLM
Silver	SW-846 7760	<0.05	_mg/L	5.0	09/22/93	_JP

Page 4

Order # 93-09-205

09/27/93 10:19

Client: DRESSER INDUSTRIES

TEST RESULTS BY SAMPLE

Sample Description: C/A 1364 SAMPLE #62

Test Description: TCLP METALS Collected: 09/07/93 06:00 Lab No: 02A

Method: SW-846

Test Code: TCLP\_M

PARAMETER METHOD RESULT UNITS LIMIT RUN	ANALYST
Arsenic <u>SW-846 6010</u> <u>&lt;0.5</u> <u>mg/L</u> <u>5.0</u> <u>09/24/93</u>	GLM
Barium <u>SW-846 6010</u> <u>0.521</u> <u>mg/L</u> <u>100.0</u> <u>09/24/93</u>	GLM
Cadmium <u>SW-846 7130</u> 0.011 <u>mg/L</u> 1.0 09/23/93	_JP
Chromium SW-846 7190 0.089 mg/L 5.0 09/23/93	_JP
Lead <u>SW-846 6010</u> <0.5 <u>mg/L</u> 5.0 <u>09/24/93</u>	_JA
Mercury SW-846 7470 <0.008 mg/L 0.2 09/22/93	JA
Selenium <u>SW-846 6010</u> <0.5 mg/L 1.0 09/24/93	GLM
Silver <u>SW-846 7760</u> <0.05 mg/L 5.0 09/22/93	

Order # 93-09-205 09/27/93 10:19

Client: DRESSER INDUSTRIES

TEST RESULTS BY SAMPLE

Sample Description: C/A 1364 SAMPLE #63

Test Description: TCLP METALS

Collected: 09/13/93 09:00

Lab No: 03A

Method: SW-846

Test Code: TCLP\_M

PARAMETER	METHOD	RESULT	UNITS	REGULATORY LIMIT	DATE RUN	ANALYST
Arsenic	SW-846 6010	<0.5	mg/L	5.0	09/24/93	GLM
Barium	SW-846 6010	0.363	_mg/L	100.0	09/24/93	GLM
Cadmium	SW-846 7130	0.011	mg/L	1.0	09/23/93	JP
Chromium	SW-846 7190	<0.05	mg/L	5.0	09/23/93	_JP
Lead	SW-846 6010	<0.5	_mg/L	5.0	09/24/93	_JA
Mercury	SW-846 7470	<0.008	_mg/L	0.2	09/22/93	_JA
Selenium	SW-846 6010	<0.5	mg/L	1.0	09/24/93	GLM
Silver	SW-846 7760	<0.05	mg/L	5.0	09/22/93	JP

Order # 93-09-205 09/27/93 10:19

Client: DRESSER INDUSTRIES

TEST RESULTS BY SAMPLE

Sample Description: C/A 1364 SAMPLE #64

Test Description: TCLP METALS

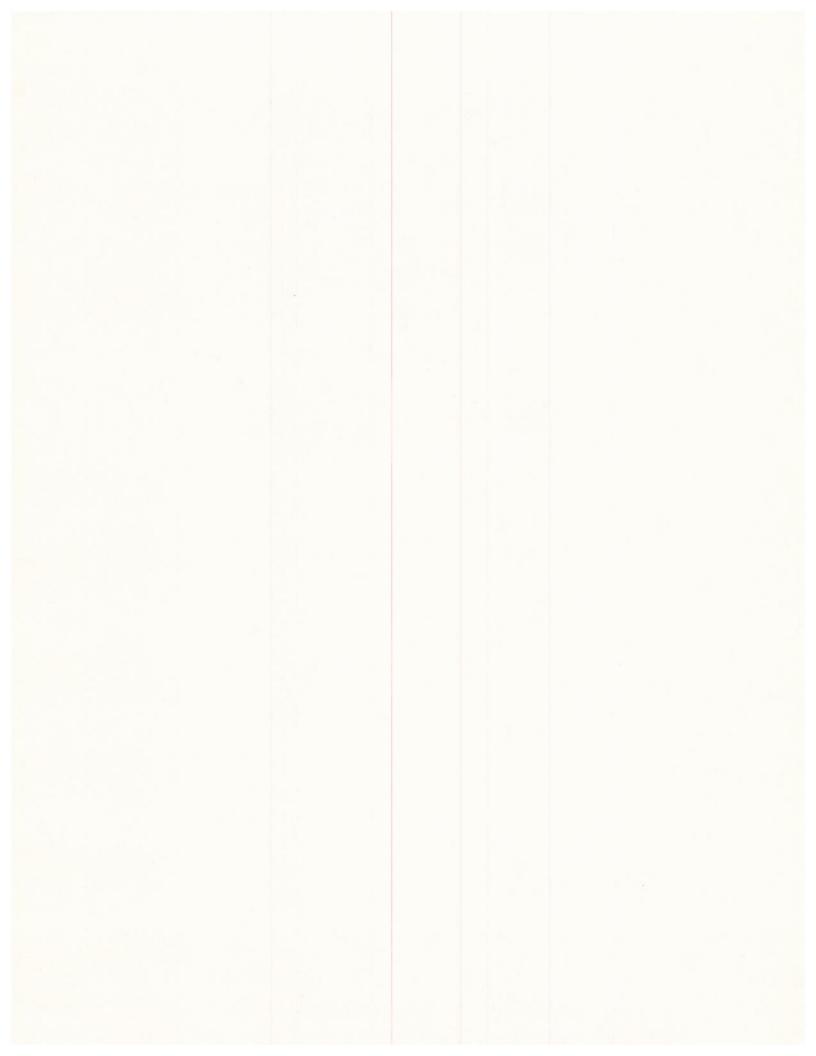
Collected: 09/13/93 09:00

Lab No: D4A

Method: SW-846

Test Code: TCLP\_M

PARAMETER	METHOD	RESULT	UNITS	REGULATORY LIMIT	DATE RUN	ANALYST
Arsenic	SW-846 6010	<0.5	mg/L	5.0	09/24/93	GLM
Barium	SW-846 6010	0.237	mg/L	100.0	09/24/93	GLM
Cadmium	SW-846 7130	0.014	_mg/L	1.0	09/23/93	JP
Chromium	SW-846 7190	<0.05	mg/L	5.0	09/23/93	_JP
Lead	SW-846 6010	<0.5	_mg/L	5.0	09/24/93	_JA
Mercury	SW-846 7470	<0.008	mg/L	0.2	09/22/93	JA
Selenium	SW-846 6010	<0.5	mg/L	1.0	09/24/93	GLM
Silver	SW-846 7760	<0.05	mg/L	5.0	09/22/93	JP





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Client DRESSER INDUSTRIES

P. O. BOX 1430

ALEXANDRIA, LA 71309-1430

318/640-6245 FAX 640-6322

Attn: RON GRUENER

Project MSO#120129/ASHES ANALSIS

Date Sampled <u>09/27/93</u> 10/11/93

Sample Type SOLID SAMPLES

P.O. # 168764-6/MW038890

Reviewed By

Lab No.

93-10-332-01

93-10-332-02

93-10-332-03

93-10-332-04

93-10-332-05

93-10-332-06

Sampled By CLIENT

Transported by <u>DELIVERY SERVICE</u>

Client No. 2\_1928\_00

Report No. 93-10-332

Report Date 11/02/93 09:58

Date Received 10/26/93

Sample Identification

SAMPLE #65~

SAMPLE #66-

SAMPLE #67-

SAMPLE #68'-

SAMPLE #69-

SAMPLE #70

SOUTHWESTERN LABORATORIES

HECTOR CORONADO

XC

JW

**DOCUMENT 4(B): 28 OF 31** 

28 F y 14, 17

Client: DRESSER INDUSTRIES

TEST RESULTS BY SAMPLE

Sample: 01A SAMPLE #65

Collected: 09/27/93 06:00

Test Name TCLP PREP.

Method Result Units SW-846 1311 10/27/93 DATE

<u>Detection</u> <u>Date</u>

Limit Started Analyst 10/28/93 JH

Sample: G2A SAMPLE #66

Collected: 09/27/93 06:00

Test Name

TCLP PREP.

Method

Result Units SW-846 1311 10/27/93 DATE

Detection Date

<u>Limit</u> <u>Started</u> <u>Analyst</u> 10/28/93 JH

Sample: 03A SAMPLE #67

Collected: 10/04/93 13:00

Test Name

TCLP PREP.

Method

Result Units SW-846 1311 10/27/93 DATE

<u>Detection</u> <u>Date</u>

<u>Limit</u> <u>Started</u> <u>Analyst</u> 10/28/93 JH

Sample: 04A SAMPLE #68

Collected: 10/04/93 13:00

Test Name

TCLP PREP.

Method

Result Units SW-846 1311 10/27/93 DATE

<u>Detection</u> <u>Date</u>

<u>Limit</u> <u>Started</u> <u>Analyst</u> 10/28/93 JH

Sample: 05A SAMPLE #69

Collected: 10/11/93 13:00

Test Name

TCLP PREP.

Method Result Units SW-846 1311 10/27/93 DATE

Detection Date

<u>Limit</u> <u>Started</u> <u>Analyst</u> 10/28/93 JH

Sample: 06A SAMPLE #70

Collected: 10/11/93 13:00

Test Name TCLP PREP.

Method

Result Units SW-846 1311 10/27/93 DATE

<u>Detection</u> <u>Date</u> <u>Limit</u> <u>Started</u> <u>Analyst</u> 10/28/93 JH

Client: DRESSER INDUSTRIES

TEST RESULTS BY SAMPLE

Sample Description: SAMPLE #65

Test Description: TCLP METALS

Collected: 09/27/93 06:00

Lab No: 01A

Method: SW-846

Test Code: TCLP\_M

PARAMETER	METHOD	RESULT	UNITS	REGULATORY LIMIT	DATE RUN	ANALYST
Arsenic	_SW-846_6010	<u>&lt;0.5</u>	mg/L	5.0	11/01/93	<u>GLM</u>
Barium	SW-846 6010	0.608	_mg/L	100.0	11/01/93	GLM
Cadmium	SW-846 6010	<0.01	mg/L	1.0	11/01/93	GLM
Chromium	SW-846 6010	<0.05	mg/L	5.0	11/01/93	GLM
Lead	SW-846 6010	<0.5	_mg/L	5.0	11/01/93	GLM
Mercury	_SW-846 7470	<0.008	_mg/L	0.2	11/01/93	_JA
Selenium	SW-846 6010	<0.5	mg/L	1.0	11/01/93	GLM
Silver	SW-846 7760	<0.05	mg/L	5.0	11/01/93	_JP

Client: DRESSER INDUSTRIES

TEST RESULTS BY SAMPLE

Sample Description: SAMPLE #66

Test Description: TCLP METALS

Collected: 09/27/93 06:00

Lab No: 02A

Method: SW-846

Test Code: TCLP\_M

PARAMETER	METHOD	RESULT	UNITS	REGULATORY LIMIT	DATE RUN	ANALYST
Arsenic	SW-846 6010	<0.5	_mg/L	5.0	11/01/93	GLM
Barium	SW-846 6010	0.548	mg/L	100.0	11/01/93	<u>GLM</u>
Cadmium	SW-846 6010	<0.01	mg/L	1.0	11/01/93	GLM
Chromium	SW-846 6010	<0.05	mg/L	5.0	11/01/93	GLM
Lead	SW-846 6010	<0.5	mg/L	5.0	11/01/93	GLM
Mercury	SW-846 7470	<0.008	mg/L	0.2	11/01/93	_JA
Selenium	SW-846 6010	<0.5	_mg/L	1.0	11/01/93	GLM
Silver	SW-846 7760	<0.05	_mg/L	5.0	11/01/93	<u>JP</u>

Client: DRESSER INDUSTRIES

TEST RESULTS BY SAMPLE

Sample Description: SAMPLE #67

Test Description: TCLP METALS

Collected: 10/04/93 13:00

Lab No: 03A

Method: SW-846

Test Code: TCLP\_M

PARAMETER	METHOD	RESULT	UNITS	REGULATORY LIMIT	DATE RUN	ANALYST
Arsenic	SW-846 6010	<0.5	mg/L	5.0	11/01/93	GLM
Barium	SW-846 6010	0.894	_mg/L	100.0	11/01/93	<u>GLM</u>
Cadmium	SW-846 6010	<0.01	mg/L	1.0	11/01/93	GLM
Chromium	SW-846 6010	<0.05	_mg/L	5.0	11/01/93	GLM
Lead	SW-846 6010	<0.5	_mg/L	5.0	11/01/93	GLM
Mercury	SW-846 7470	<0.008	_mg/L	0.2	11/01/93	_JA
Selenium	SW-846 6010	<0.5	_mg/L	1.0	11/01/93	GLM
Silver	SW-846 7760	<0.05	mg/L	5.0	11/01/93	<u>JP</u>

Client: DRESSER INDUSTRIES

TEST RESULTS BY SAMPLE

Sample Description: SAMPLE #68

Test Description: TCLP METALS

Collected: 10/04/93 13:00

Lab No: 04A

Method: SW-846

Test Code: TCLP\_M

PARAMETER	METHOD	RESULT	UNITS	REGULATORY LIMIT	DATE Run	ANALYST
Arsenic	SW-846 6010	<0.5	<u>mg/L</u>	5.0	11/01/93	GLM
Barium	SW-846 6010	<0.22	_mg/L	100.0	11/01/93	GLM
Cadmium	SW-846 6010	0.038	mg/L	1.0	11/01/93	GLM
Chromium	SW-846 6010	0.603	_mg/L	5.0	11/01/93	GLM
Lead	SW-846 6010	<0.5	mg/L	5.0	11/01/93	GLM
Mercury	SW-846 7470	<0.008	mg/L	0.2	11/01/93	A
Selenium	_SW-846_6010	<0.5	mg/L	1.0	11/01/93	GLM
Silver	SW-846 7760	<u>~0.05</u>	mg/L	5.0	11/01/93	_JP

Client: DRESSER INDUSTRIES

TEST RESULTS BY SAMPLE

Sample Description: SAMPLE #69

Test Description: TCLP METALS

Collected: 10/11/93 13:00

Lab No: 05A

Method: SW-846

Test Code: TCLP\_M

PARAMETER	METHOD	RESULT	UNITS	REGULATORY LIMIT	DATE RUN	ANALYST
Arsenic	_SW-846_6010	<0.5	_mg/L	5.0	11/01/93	GLM
Barium	_SW-846_6010	<0.22	_mg/L	100.0	11/01/93	GLM
Cadmium	SW-846 6010	0.475	mg/L	1.0	11/01/93	GLM
Chromium	SW-846 6010	<0.05	_mg/L	5.0	11/01/93	GLM
Lead	SW-846 6010	<u>&lt;0.5</u>	_mg/L	5.0	11/01/93	GLM
Mercury	_SW-846 7470	<0.008	mg/L	0.2	11/01/93	_JA
Selenium	SW-846 6010	<0.5	_mg/L	1.0	11/01/93	GLM
Silver	SW-846 7760	<0.05	_mg/L	5.0	11/01/93	JP

Client: DRESSER INDUSTRIES

TEST RESULTS BY SAMPLE

Sample Description: SAMPLE #70

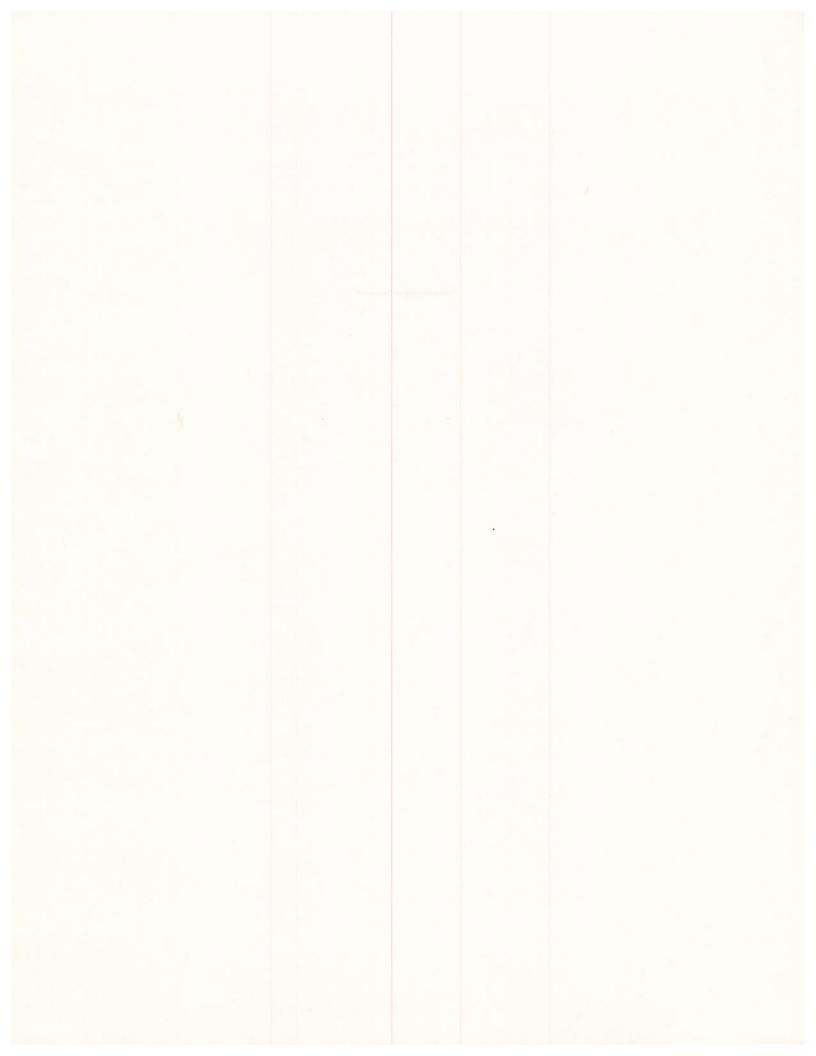
Test Description: TCLP METALS
Collected: 10/11/93 13:00

Lab No: 06A

Method: SW-846

Test Code: TCLP\_M

PARAMETER	METHOD	RESULT	UNITS	REGULATORY LIMIT	DATE RUN	ANALYST
Arsenic	SW-846 6010	<0.5	_mg/L	5.0	11/01/93	GLM
Barium	SW-846 6010	<0.22	_mg/L	100.0	11/01/93	GLM
Cadmium	SW-846 6010	0.382	_mg/L	1.0	11/01/93	GLM
Chromium	SW-846 6010	<0.05	_mg/L	5.0	11/01/93	GLM
Lead	SW-846 6010	<0.5	_mg/L	5.0	11/01/93	GLM
Mercury	SW-846 7470	<0.008	mg/L	0.2	11/01/93	_JA
Selenium	SW-846 6010	<u>&lt;0.5</u>	_mg/L	1.0	11/01/93	GLM
Silver	SW-846 7760	<0.05	mg/L	5.0	11/01/93	_JP



Client No. 2\_1928\_00

Report No. 94-01-168

Report Date 01/19/94 10:12



# SOUTHWESTERN LABORATORIES

222 CAVALCADE \* P.O. BOX 8768, HOUSTON, TEXAS 77249 \* 713 692-9151

Client DRESSER INDUSTRIES

P. O. BOX 1430

ALEXANDRIA, LA 71309-1430 318/640-6245 FAX 640-6322

Attn: TERRY TURNER

Project MSO#120129/ASHES ANALYSIS

Date Sampled 11/08/93 01/10/94

Sample Type ASH SAMPLES

P.O. # P0168734-6

Lab No.

94-01-168-01

94-01-168-02

94-01-168-03

94-01-168-04

94-01-168-05

94-01-168-06

Sampled By CLIENT

Transported by <u>DELIVERY SERVICE</u>

Date Received 01/14/94

Sample Identification

C/A 1364 SAMPLE #73

C/A 1364 SAMPLE #74

C/A 1364 SAMPLE #75

C/A 1364 SAMPLE #76

C/A 1364 SAMPLE #77

C/A 1364 SAMPLE #78

SOUTHWESTERN LABORATORIES

Reviewed By

HECTOR CORONADO

Ashes Cleared for

**DOCUMENT 4(B): 29 OF 31** 

Page 2

Order # 94-01-168 01/19/94 10:12

TEST RESULTS BY SAMPLE

Client: DRESSER INDUSTRIES

Sample: 01A C/A 1364 SAMPLE #73 Collected: 11/08/93

Test Name TCLP PREP.

Method Result Units

<u>Detection</u> <u>Date</u>

<u>Limit</u> <u>Started</u> Analyst

SW-846 1311 01/16/94 DATE

01/17/94 JH

Sample: 02A C/A 1364 SAMPLE #74 Collected: 11/15/93

Test Name

TCLP PREP.

Method Result Units SW-846 1311 01/16/94 DATE

<u>Detection</u> <u>Date</u>

<u>Limit</u> <u>Started</u> <u>Analyst</u>

01/17/94 JH

Sample: 03A C/A 1364 SAMPLE #75

Collected: 12/06/93

Test Name TCLP PREP.

Method Result Units SW-846 1311 01/16/94 DATE

<u>Detection</u> Date

<u>Limit</u> Started Analyst

01/17/94 JH

Sample: 04A C/A 1364 SAMPLE #76 Collected: 11/22/93

Test Name

TCLP PREP.

Method

Result Units SW-846 1311 01/16/94 DATE

Detection Date

<u>Limit</u> <u>Started</u> <u>Analyst</u> 01/17/94 JH

Sample: 05A C/A 1364 SAMPLE #77 Collected: 01/03/94

Test Name

TCLP PREP.

Method Result Units SW-846 1311 01/16/94 DATE

<u>Detection</u> <u>Date</u>

<u>Limit</u> <u>Started</u> <u>Analyst</u>

01/17/94 JH

Sample: 06A C/A 1364 SAMPLE #78 Collected: 01/10/94

Test Name

TCLP PREP.

Method

Result Units SW-846 1311 01/16/94 DATE

Detection Date

<u>Limit</u> <u>Started</u> <u>Analyst</u> 01/17/94 JH

Order # 94-01-168 01/19/94 10:12

Client: DRESSER INDUSTRIES

TECT	RESULTS	nv	CAMOLE
IESI	KESULIS	RT.	SAMPLE

Sample Description: C/A 1364 SAMPLE #73

Test Description: TCLP METALS

Collected: 11/08/93

Lab No: 01A

Method: SW-846

Test Code: TCLP\_M

#### TCLP METALS

PARAMETER	METHOD	RESULT	UNITS	REGULATORY LIMIT	DATE RUN	ANALYST
Arsenic	SW-846 6010	<0.5	mg/L	5.0	01/18/94	GLM
Barium	SW-846 6010	0.809	mg/L	100.0	01/18/94	GLM
Cadmium	SW-846 6010	<0.01	mg/L	1.0	01/18/94	GLM
Chromium	SW-846 6010	1.25	mg/L	5.0	01/18/94	GLM
Lead	SW-846 6010	<0.5	mg/L	5.0	01/18/94	GLM
Mercury	SW-846 7470	<0.008	mg/L	0.2	01/18/94	_JP
Selenium	SW-846 6010	<0.5	mg/L	1.0	01/18/94	GLM
Silver	_SW-846_7760	<0.05	mg/L	5.0	01/18/94	GLM

Order # 94-01-168 01/19/94 10:12

TEST RESULTS BY SAMPLE

Client: DRESSER INDUSTRIES

Sample Description: C/A 1364 SAMPLE #74

Test Description: TCLP METALS

Collected: 11/15/93

Lab No: 02A

Method: SW-846

Test Code: TCLP\_M

#### TCLP METALS

PARAMETER	METHOD	RESULT	UNITS	REGULATORY LIMIT	DATE RUN	ANALYST
Arsenic	SW-846 6010	<0.5	mg/L	5.0	01/18/94	GLM
Barium	SW-846 6010	0.599	mg/L	100.0	01/18/94	GLM
Cadmium	SW-846 6010	<0.01	_mg/L	1.0	01/18/94	GLM
Chromium	SW-846 6010	0.418	_mg/L	5.0	01/18/94	GLM
Lead	SW-846 6010	<0.5	mg/L	5.0	01/18/94	GLM
Mercury	SW-846 7470	<0.008	mg/L	0.2	01/18/94	_JP
Selenium	SW-846 6010	<0.5	mg/L	1.0	01/18/94	GLM
Silver	SW-846 7760	<0.05	mg/L	5.0	01/18/94	GLM

Order # 94-01-168 01/19/94 10:12

Client: DRESSER INDUSTRIES

TECT			-		
1521	KESUL	.15	ВT	SAMPL F	•

Sample Description: C/A 1364 SAMPLE #75

Test Description: TCLP METALS

Collected: 12/06/93

Lab No: 03A

Method: SW-846

Test Code: TCLP\_M

#### TCLP METALS

PARAMETER	METHOD	RESULT	UNITS	REGULATORY LIMIT	DATE RUN	ANALYST
Arsenic	SW-846 6010	<0.5	_mg/L	5.0	01/18/94	GLM
Barium	SW-846 6010	1.03	_mg/L	100.0	01/18/94	GLM
Cadmium	SW-846 6010	0.365	mg/L	1.0	01/18/94	GLM
Chromium	SW-846 6010	0.588	_mg/L	5.0	01/18/94	GLM
Lead	SW-846 6010	<0.5	mg/L	5.0	01/18/94	GLM
Mercury	SW-846 7470	<0.008	mg/L	0.2	01/18/94	<u>JP</u>
Selenium	_SW-846_6010	<0.5	mg/L	1.0	01/18/94	GLM
Silver	SW-846 7760	<0.05	mg/L	5.0	01/18/94	GLM

Order # 94-01-168 01/19/94 10:12

Client: DRESSER INDUSTRIES

TEST RESULTS BY SAMPLE

Sample Description: C/A 1364 SAMPLE #76

Test Description: TCLP METALS

Collected: 11/22/93

Lab No: 04A

Method: SW-846

Test Code: TCLP\_M

## TCLP METALS

PARAMETER	METHOD	RESULT	UNITS	REGULATORY LIMIT	DATE RUN	ANALYST
Arsenic	SW-846 6010	<0.5	_mg/L	5.0	01/18/94	GLM
Barium	SW-846 6010	<0.22	mg/L	100.0	01/18/94	GLM
Cadmium	SW-846 6010	0.080	mg/L	1.0	01/18/94	GLM
Chromium	_SW-846_6010	1.85	_mg/L	5.0	01/18/94	GLM
Lead	_SW-846_6010	<0.5	_mg/L	5.0	01/18/94	GLM
Mercury	SW-846 7470	<0.008	_mg/L	0.2	01/18/94	_JP
Selenium	SW-846 6010	<0.5	_mg/L	1.0	01/18/94	<u>GLM</u>
Silver	SW-846 7760	<0.05	mg/L	5.0	01/18/94	GLM

Order # 94-01-168 01/19/94 10:12

Client: DRESSER INDUSTRIES

TEST RESULTS BY SAMPLE

Sample Description: C/A 1364 SAMPLE #77

Test Description: TCLP METALS

Collected: 01/03/94

Lab No: 05A

Method: SW-846 Test Code: TCLP\_M

PARAMETER	METHOD	RESULT	UNITS	REGULATORY LIMIT	DATE RUN	ANALYST
Arsenic	SW-846 6010	<0.5	mg/L	5.0	01/18/94	GLM
Barium	SW-846 6010	0.271	_mg/L	100.0	01/18/94	GLM
Cadmium	SW-846 6010	<0.01	<u>mg/L</u>	1.0	01/18/94	GLM
Chromium	SW-846 6010	0.392	_mg/L	5.0	01/18/94	GLM
Lead	SW-846 6010	<0.5	mg/L	5.0	01/18/94	GLM
Mercury	SW-846 7470	<0.008	mg/L	0.2	01/18/94	<u>JP</u>
Selenium	SW-846 6010	<0.5	mg/L	1.0	01/18/94	GLM
Silver	_SW-846 7760	<0.05	mg/L	5.0	01/18/94	GLM

Order # 94-01-168 01/19/94 10:12

Client: DRESSER INDUSTRIES

TEST RESULTS BY SAMPLE

Sample Description: C/A 1364 SAMPLE #78

Test Description: TCLP METALS

Collected: 01/10/94

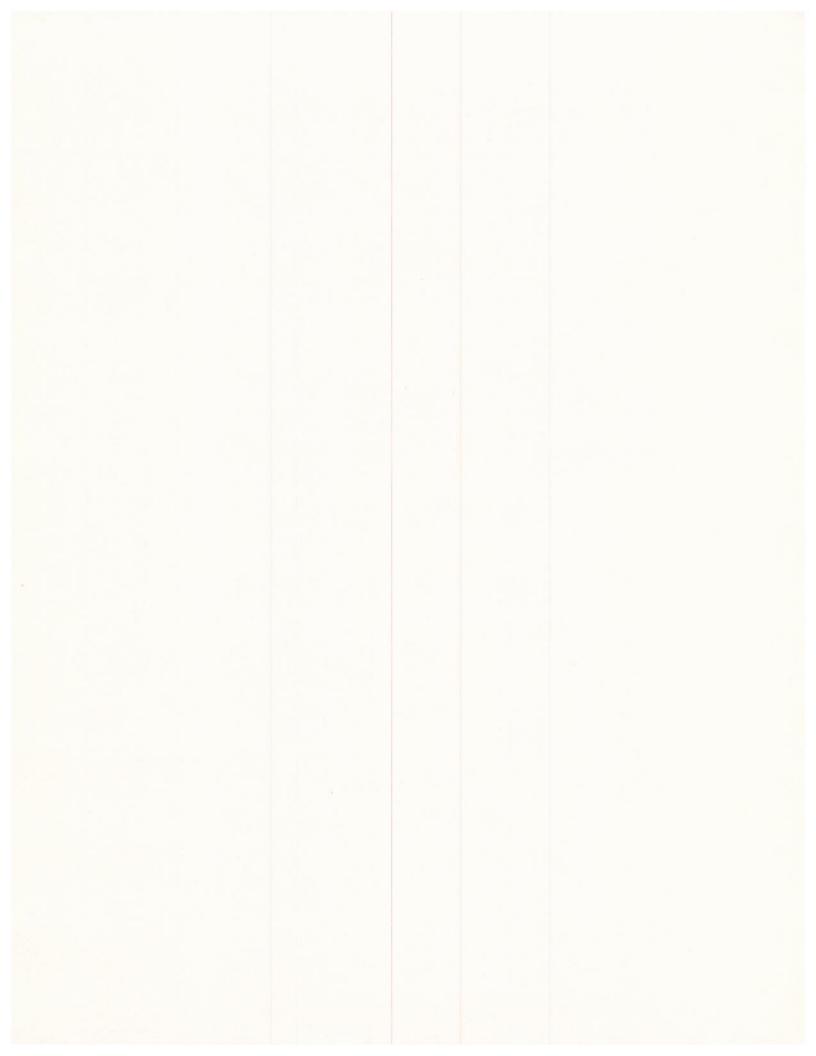
Lab No: O6A

Method: SW-846

Test Code: TCLP\_M

#### TCLP METALS

PARAMETER	METHOD	RESULT	UNITS	REGULATORY LIMIT	DATE RUN	ANALYST
Arsenic	SW-846 6010	<0.5	mg/L	5.0	01/18/94	GLM
Barium	SW-846 6010	0.279	mg/L	100.0	01/18/94	GLM
Cadmium	SW-846 6010	0.036	mg/L	1.0	01/18/94	GLM
Chromium	SW-846 6010	0.058	_mg/L	5.0	01/18/94	GLM
Lead	SW-846 6010	<0.5	mg/L	5.0	01/18/94	<u>GLM</u>
Mercury	SW-846 7470	<0.008	_mg/L	0.2	01/18/94	<u>_JP</u>
Selenium	SW-846 6010	<0.5	_mg/L	1.0	01/18/94	GLM
Silver	SW-846 7760	<0.05	mg/L	5.0	01/18/94	GLM





# SOUTHWESTERN LABORAT

222 CAVALCADE \* P.O. BOX 8768, HOUSTON, TEXAS 77249

Client DRESSER INDUSTRIES

P. O. BOX 1430

71309-1430 ALEXANDRIA, LA

318/640-6245 FAX 640-6322

Attn: TERRY TURNER

Project MSO#120129/TCLP ANALYSIS

Date Sampled 01/20/94

Sample Type ASH SAMPLES

P.O. # 168734-6

Lab No. 94-01-276-01 Sampled By CLIENT

Transported by DELIVERY SERVICE

Date Received 01/24/94

Sample Identification

SAMPLE #79

SOUTHWESTERN LABORATORIES

Client No. 2\_1928\_00

Report No. 94-01-276

Report Date 02/01/94 09:35

HECTOR CORONADO

XC: El Med 6/21/94

**DOCUMENT 4(B): 30 OF 31** 

Order # 94-01-276 02/01/94 09:35

Client: DRESSER INDUSTRIES

TEST RESULTS BY SAMPLE

Page 2

Sample: 01A SAMPLE #79

Collected: 01/20/94 11:00

<u>Detection</u> <u>Date</u>

 Test Name
 Method
 Result Units
 Limit
 Started
 Analyst

 TCLP PREP.
 SW-846 1311
 01/26/94
 DATE
 01/27/94
 JH

Order # 94-01-276 02/01/94 09:35

Client: DRESSER INDUSTRIES

TEST RESULTS BY SAMPLE

Sample Description: SAMPLE #79

Test Description: TCLP METALS

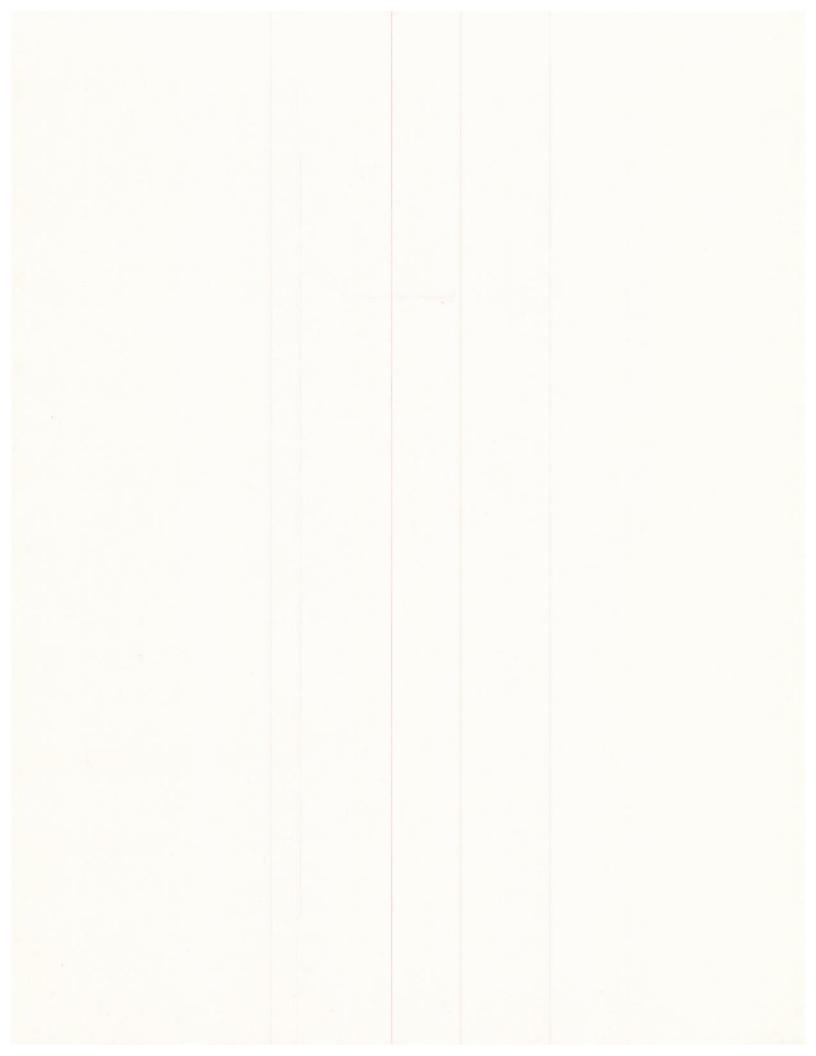
Collected: 01/20/94 11:00

Lab No: 01A

Method: SW-846

Test Code: TCLP\_M

PARAMETER	METHOD	RESULT	UNITS	REGULATORY LIMIT	DATE RUN	ANALYST
Arsenic	SW-846 6010	<0.5	mg/L	5.0	01/31/94	GLM
Barium	SW-846 6010	1.19	_mg/L	100.0	01/28/94	GLM
Cadmium	SW-846 6010	0.029	mg/L	1.0	01/28/94	GLM
Chromium	SW-846 6010	2.35	mg/L	5.0	01/28/94	GLM
Lead	SW-846 6010	<0.5	mg/L	5.0	01/31/94	GLM
Mercury	SW-846 7470	<0.008	mg/L	0.2	02/01/94	JP
Selenium	SW-846 6010	<0.5	mg/L	1.0	01/31/94	GLM
Silver	_SW-846 7760	<0.05	mg/L	5.0	01/29/94	<u>JP</u>



Client No. 2192800

Report No. 94-04-068

Report Date 04/22/94 12:51



# SOUTHWESTERN LABORATORIES

222 CAVALCADE P.O. BOX 8768, HOUSTON, TEXAS 77249 \* 713 692-9151

Client DRESSER INDUSTRIES

P. O. BOX 1430

ALEXANDRIA, LA 71309-1430 318/640-6245 FAX 640-6322

Attn: TERRY TURNER

Project MWO 43922/TCLP ANALYSIS

Date Sampled 02/14/94 03/07/94

Sample Type ASHE SAMPLES

P.O. # 170476-6

Lab No.

94-04-068-01

94-04-068-02

94-04-068-03

94-04-068-04

Sampled By CLIENT

Transported by DELIVERY SERVICE

Date Received 04/06/94

Sample Identification

#82/MWO 43922

#83/MWO 43922

#84/MWO 43922

#85/MWO 43922

SOUTHWESTERN LABORATORIES

Reviewed By

HECTOR CORONADO

Xe: In For Angel DB

DOCUMENT 4(B): 31 OF 31

Order # 94-04-068 04/22/94 12:51

Client: DRESSER INDUSTRIES

TEST RESULTS BY SAMPLE

Sample: 01A #82/MWO 43922

Collected: 02/14/94 06:00

<u>Detection</u> <u>Date</u>

Test Name - Method Result Units <u>Limit</u> <u>Started</u> <u>Analyst</u> TCLP PREP. SW-846 1311 04/08/94 DATE 04/09/94 JH

Sample: 02A #83/MWO 43922 Collected: 02/21/94 06:00

Detection Date

Test Name Method Result Units <u>Limit</u> <u>Started</u> <u>Analyst</u> TCLP PREP. SW-846 1311 04/08/94 DATE 04/09/94 JH

Sample: 03A #84/MWO 43922 Collected: 02/28/94 06:00

<u>Detection</u> <u>Date</u>

Test Name Method Result Units <u>Limit</u> <u>Started</u> <u>Analyst</u> TCLP PREP. SW-846 1311 04/08/94 DATE 04/09/94 JH

Sample: 04A #85/MWO 43922 Collected: 03/07/94 06:00

<u>Detection</u> <u>Date</u>

Test Name Method Result Units <u>Limit</u> <u>Started</u> <u>Analyst</u>

TCLP PREP. 04/09/94 JH SW-846 1311 04/08/94 DATE

Order # 94-04-068 04/22/94 12:51

Client: DRESSER INDUSTRIES

TEST RESULTS BY SAMPLE

Sample Description: #82/MWO 43922

Test Description: TCLP METALS

Lab No: 01A

Method: SW-846

Test Code: TCLP\_M

Collected: 02/14/94 06:00

#### TCLP METALS

PARAMETER	METHOD	RESULT	UNITS	REGULATORY LIMIT	DATE RUN	ANALYST
Arsenic	SW-846 6010	<0.5	mg/L	5.0	04/13/94	JP
Barium	SW-846 6010	0.525	mg/L	100.0	04/12/94	_JP
Cadmium	SW-846 6010	<0.01	mg/L	1.0	04/12/94	_JP
Chromium	SW-846 6010	0.316	mg/L	5.0	04/12/94	_JP
Lead	SW-846 6010	0.600	mg/L	5.0	04/13/94	JP
Mercury	SW-846 7470	<0.008	mg/L	0.2	04/13/94	_JA
Selenium	SW-846 6010	<0.5	mg/L	1.0	04/21/94	<u>GMB</u>
Silver	SW-846 7760	<0.05	mg/L	5.0	04/13/94	<u>JP</u>

Order # 94-04-068 04/22/94 12:51

Client: DRESSER INDUSTRIES

TEST RESULTS BY SAMPLE

Sample Description: #83/MWO 43922

Test Description: TCLP METALS

Collected: 02/21/94 06:00

Lab No: 02A

Method: SW-846

Test Code: TCLP\_M

#### TCLP METALS

PARAMETER	METHOD	RESULT	UNITS	REGULATORY LIMIT	DATE Run	ANALYST
Arsenic	SW-846 6010	<u>&lt;0.5</u>	mg/L	5.0	04/13/94	_JP
Barium	SW-846 6010	0.945	mg/L	100.0	04/12/94	JP
Cadmium	SW-846 6010	<0.01	_mg/L	1.0	04/12/94	JP
Chromium	SW-846 6010	0.485	mg/L	5.0	04/12/94	_JP
Lead	SW-846 6010	<0.5	mg/L	5.0	04/13/94	_JP
Mercury	SW-846 7470	<0.008	mg/L	0.2	04/13/94	_JA
Selenium	SW-846 6010	<0.5	mg/L	1.0	04/21/94	<u>GMB</u>
Silver	SW-846 7760	<0.05	mg/L	5.0	04/13/94	JP

Order # 94-04-068 04/22/94 12:51

Client: DRESSER INDUSTRIES

TEST	PESIII	TC	DY	SAMPLE
1531	KESUL	. 13	51	SAMPLE

Sample Description: #84/MWO 43922

Test Description: TCLP METALS

Collected: 02/28/94 06:00

Lab No: 03A

Method: SW-846

Test Code: TCLP\_M

### TCLP METALS

PARAMETER	METHOD	RESULT	UNITS	REGULATORY LIMIT	DATE <u>Run</u>	ANALYST
Arsenic	SW-846 6010	<0.5	mg/L	5.0	04/13/94	JP
Barium	SW-846 6010	0.917	mg/L	100.0	04/12/94	JP
Cadmium	SW-846 6010	0.043	mg/L	1_0	04/12/94	_JP
Chromium	SW-846 6010	0.168	mg/L	5.0	04/12/94	_JP
Lead	SW-846 6010	<0.5	_mg/L	5.0	04/13/94	JP
Mercury	SW-846 7470	<0.008	mg/L	0.2	04/13/94	JP
Selenium	SW-846 6010	<u>&lt;0.5</u>	mg/L	1.0	04/13/94	JP
Silver	SW-846 7760	<0.05	mg/L	5.0	04/13/94	<u>_JP</u>

### SOUTHWESTERN LABORATORIES

Order # 94-04-068 04/22/94 12:51

Client: DRESSER INDUSTRIES

TEST RESULTS BY SAMPLE

Sample Description: #85/MWO 43922

Test Description: TCLP METALS

Collected: 03/07/94 06:00

Lab No: 04A

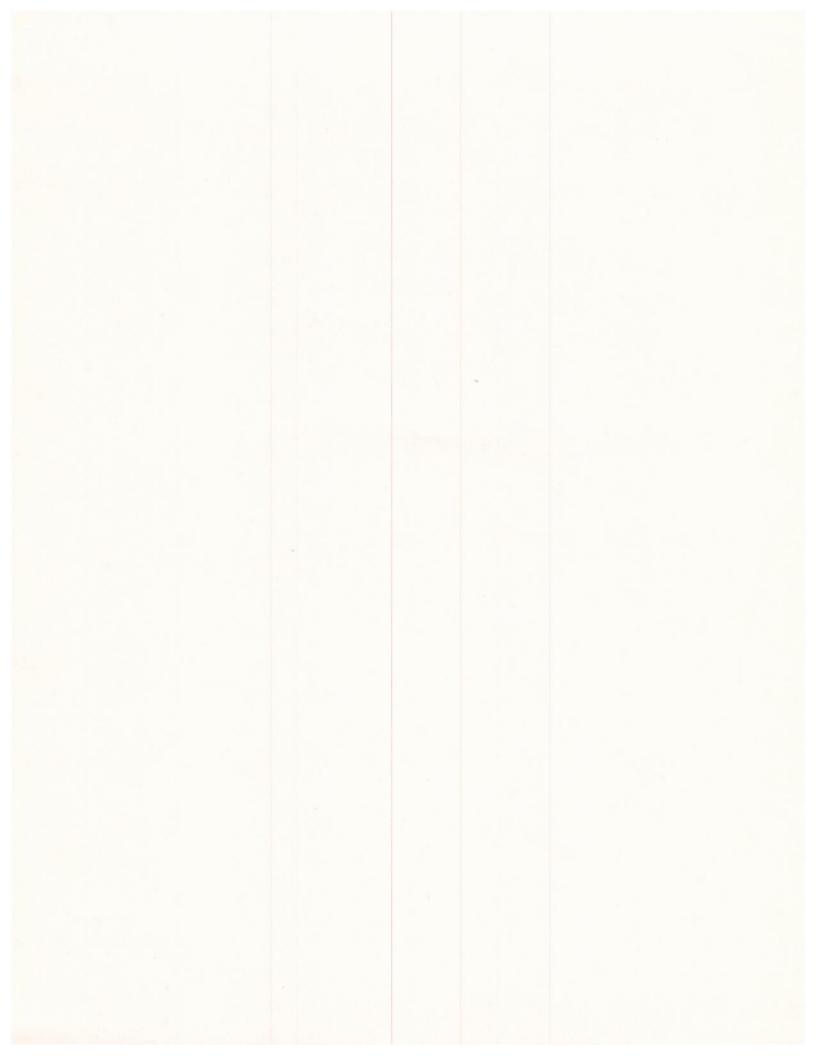
Method: SW-846

Test Code: TCLP\_M

### TCLP METALS

PARAMETER	METHOD	RESULT	UNITS	REGULATORY LIMIT	DATE RUN	ANALYST
Arsenic	SW-846 6010	<0.5	mg/L	5.0	04/13/94	_JP
Barium	SW-846 6010	0.702	mg/L	100.0	04/12/94	_JP
Cadmium	SW-846 6010	0.125	mg/L	1.0	04/12/94	_JP
Chromium	SW-846 6010	<0.05	mg/L	5.0	04/12/94	JP
Lead	_SW-846_6010	<0.5	mg/L	5.0	04/13/94	JP
Mercury	SW-846 7470	<0.008	mg/L	0.2	04/13/94	_JA
Selenium	SW-846 6010	<0.5	_mg/L	1.0	04/13/94	JP
Silver	SW-846 7760	<0.05	mg/L	5.0	04/13/94	JP

Page 6





# SOUTHWESTERN LABORATORIES

222 CAVALCADE \* P.O. BOX 8768, HOUSTON, TEXAS 77249 \* 713 692-9151



Client DRESSER INDUSTRIES

P. O. BOX 1430

ALEXANDRIA, LA 71309-1430 318/640-6245 FAX 640-6322

Attn: TERRY TURNER

Client No. 2\_1928\_00 Report No. 93-08-268 Report Date 08/30/93 12:07

E. J. MCC The CEC.

Project MSO# 119287/TCLP-RCI ANALSIS AS Wes

Date Sampled <u>08/16/93</u>

Sample Type <u>SOLID SAMPLES</u>

P.O. # 168222-6/MWO 36941

<u>Lab No.</u> 93-08-268-01 93-08-268-02 Sampled By CLIENT

Transported by <u>DELIVERY SERVICE</u>

Date Received 08/18/93

Sample Identification C/A 1364 NO. 55 C/A 1364 NO. 56

SOUTHWESTERN LABORATORIES

HECTOR CORONADO

Reviewed By

DOCUMENT 4(C): TCLP - IGNITABLE, CORROSIVE, REACTIVE, TOXIC

XC: D Mes

Cleared Dupins Non-Haz. MMWO 41185 11/22/93

201

Örder # 93-08-268 08/30/93 12:07

TEST RESULTS BY SAMPLE

Client: DRESSER INDUSTRIES

Sample: 01A C/A 1364 NO. 55

Collected: 08/16/93 06:00

5 <b>-</b> 10 - 10 - 10 - 10 - 10 - 10 - 10 - 10				Detection	n Date	
Test Name	Method	<u>Result</u>	<u>Units</u>	Limit	Started	Analyst
IGNITABILITY, CLOSED-CUP	SW-846 1010	>210	deg. F	2 <del>1</del>	08/23/93	
REACTIVITY CYANIDE	SW-846 7.3.3	<0.40	ppm	0.40		
REACTIVITY SULFIDE	SW-846 7.3.4	<20	ppm	20	08/20/93	11750700
TCLP PREP.	SW-846 1311	08/23/93	DATE		08/24/93	
рН	SW-846 9045	10.73	pH units		08/18/93	

Sample: 02A C/A 1364 NO. 56

Collected: 08/16/93 06:00

				<u>Detection</u> <u>Date</u>				
Test Name	<u>Method</u>	Result	<u>Units</u>	Limit	Started	Analyst		
IGNITABILITY, CLOSED-CUP	SW-846 1010	>210	deg. F		08/23/93			
REACTIVITY CYANIDE	SW-846 7.3.3	<0.40	ppm	0.40	08/20/93	RC		
REACTIVITY SULFIDE	SW-846 7.3.4	<20	ppm	20	08/20/93			
TCLP PREP.	SW-846 1311	08/23/93	DATE		08/24/93	JH		
рН	SW-846 9045	10.86	pH units		08/18/93	EU		

Order # 93-08-268 08/30/93 12:07

Client: DRESSER INDUSTRIES

TEST RESULTS BY SAMPLE

Sample Description: C/A 1364 NO. 55

Test Description: TCLP METALS

Collected: 08/16/93 06:00

Lab No: 01A

Method: SW-846

Test Code: TCLP\_M

### TCLP METALS

PARAMETER	METHOD	RESULT	UNITS	REGULATORY LIMIT	DATE <u>Run</u>	ANALYST
Arsenic	SW-846 6010	<0.5	_mg/L	5.0	08/25/93	GLM
Barium	SW-846 6010	0.934	mg/L	100.0	08/25/93	GLM
Cadmium	SW-846 6010	<0.01	mg/L	1.0	08/25/93	GLM
Chromium	SW-846 6010	0.912	mg/L	5.0	08/25/93	GLM
Lead	SW-846 6010	<0.5	mg/L	5.0	08/25/93	GLM
Mercury	SW-846 7470	<0.008	mg/L	0.2	08/25/93	_JA
Selenium	SW-846 6010	<u>&lt;0.5</u>	mg/L	1.0	08/25/93	GLM
Silver	SW-846 7760	0.075	mg/L	5.0	08/25/93	GLM

Order # 93-08-268 08/30/93 12:07

Client: DRESSER INDUSTRIES

TEST RESULTS BY SAMPLE

ample Description: C/A 1364 NO. 56

Test Description: TCLP METALS

1364 NO. 36 Lab No: 1

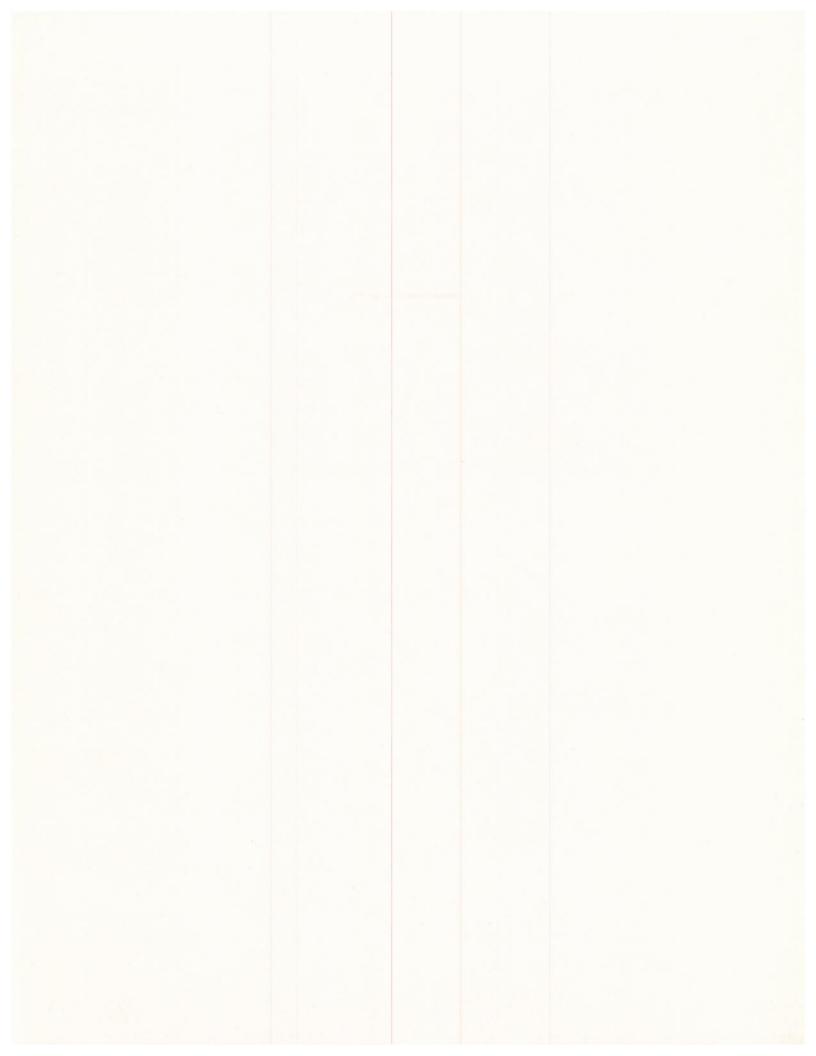
Collected: 08/16/93 06:00

Lab No: 02A

Method: SW-846 Test Code: TCLP\_M

### TCLP METALS

PARAMETER	METHOD	RESULT	UNITS	REGULATORY LIMIT	DATE <u>Run</u>	ANALYST
Arsenic	SW-846 6010	<u>&lt;0.5</u>	_mg/L	5.0	08/25/93	GLM
Barium	SW-846 6010	0.800	_mg/L	100.0	08/25/93	GLM
Cadmium	SW-846 6010	0.088	_mg/L	1.0	08/25/93	GLM
Chromium	SW-846 6010	<0.05	_mg/L	5.0	08/25/93	GLM
Lead	SW-846 6010	<0.5	_mg/L	5.0	08/25/93	GLM
Mercury	SW-846 7470	<0.008	<u>mg/L</u>	0.2	08/25/93	_JA
Selenium	_SW-846_6010	<0.5	_mg/L	1.0	08/25/93	GLM
Silver	SW-846 7760	0.072	mg/L	5.0	08/25/93	GLM



# STATE OF LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY MAZARDOUS WASTE DIVISION P.O. BOX 82178 BATON ROUGE, LOUISIANA 70884-2178

EPA Form 8700-22 k(Hev. 9/88) Previous edition is obsolete.

Document 5 (B) SR# 536172

PLE	ASE PRINT OR TYPE (Form designed for use on eli	te (12-pitch) typewriter.)			Form A	Approved. OMB	No. 2050-	CLCH 0039. Expires 9-30-99
(	UNIFORM HAZARDOUS WASTE MANIFEST	1. Generator's US EPA ID	180	Manifest A	2. Page	1 Inform	ation in t	the shaded areas
	Generator's Name and Mailing Address	4 A D Q 7 11 9	492331		of A. Stat	1 Is not te Manifest Docu	10000	by Federal law.
	DRESSER INDUSTRIES HWY 167 NORTH					Y A		23550
	ALEXANDRIA LA 71309-1430 4. Generator's Phone ( 318) 646-22	50			1 1231-124	e Generator's ID	- F. H. S. T.	
	Transporter 1 Company Name	6.	US EPA ID Numbe	er	C. Stat	e Transporter's I	565	H
	7 Transporter 2 Company Manny		117 DU 4	180		sporter's Phone		558-7573
1	Usasam Econoad bargy, Inc.	1 1 1	US EPA ID Numbe	er III		e Transporter's I	Dira insyl	1473.
	Designated Facility Name and Site Address	1C.	US EPA ID Numbe	er		e Facility's ID		
	CHEMICAL WASTE MANAGEMENT, 7170 JOHN BRANNON RD.	INC.			U Eooi	litu'a Dhana		99922
	SULPHUR LA 70665	IUA	0000777	7201	n. raci	lity's Phone	(337	)583-2169
	11. US DOT Description (Including Proper Shipping			12. Cont	ainers	13. Total	14 Unit	- I.
- No.				No.	Туре	Quantity	Wt/Vol	Waste No.
G	RQ, HAZARDOUS WASTE, SOLI	D, N.U.S, Y, NAJC	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	25 25 59		100		D008
NER	b.		A54350	991	GM	1118	5 63	
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	Additional Descriptions for Materials Listed Above     A. A54350.		- 100 HP		K. Hand	tling Codes for V 1A. M132	Vastes List	ed Above
	DISCREPANCIES CONTACT Take	und Alasta a	1 2000 /da	110		1n. ht32	Re ampl	
	and ones on a second		1 (3/8) 1040	611.			al mon	
	15. Special Handling Instructions and Additional Infor					160	10/1	0978
	IN CASE OF A SPILL AVOID SI		ONTIAN MATERI	AL.		Pos	2530	74061
	IN CASE OF AN EMERGENCY COL				)	_		DIFFIL
	A. ERG# 171.		del Agos		······			75 374
	(2 <sup>2</sup> )	Delpe	500 V/2	21/	or 1	Maria	2	
	<ol> <li>GENERATOR'S CERTIFICATION: I here by declar in all respects in proper condition for transport by highway according.</li> </ol>	ng to applicable international and national	government regulations.	ed above by pro-		name and are classifie		rked, and labeled, and are
	If I am a large quantity generator, I cortify that I have a program method of treatment, storage, or disposal currently available to me my waste generation and select the best waste management method.	in place to reduce the volume and toxic a which minimize the present and future of that is available to me and that I can at	threat to human health and the e ford	e I have determinention	ned to be ec If I am a sma	onomically practicable ill quantity generator, I	and that I have have made a c	e sciedted the practicable good raith effort to minimize
W	Printed/Typed Name (60.570 5)	Per Visoid	ignature //	71	<b>'</b> . 7	4	, ^	Month Day Year
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7	19. Discrepancy Indication Space							
Ç		DOCUMENT	5(A): MANIFES	Т				
L	20 Encility Dynner or Country Country							
Y	<ol> <li>Facility Owner or Operator: Certification of receip Printed/Typed Name</li> </ol>		ered by this manifest exignature	cept as note	d in Item	19.	Λ	fonth Day Year
	Í		(II)					

COPY 2: FACILITY TO GENERATOR

DEPARTMENT OF ENVIRONMENTAL QUALITY
HAZARDOUS WASTE DIVISION
P.O. BOX 82178
BATON ROUGE, LOUISIANA 70884-2178

SE PRINT OR TYPE (Form designed for use on elite (12-pitch) typewriter.)				No. 2050-0	
UNIFORM HAZARDOUS  WASTE MANIFEST  1. Generator's US EPA ID No.  1. A D 0 7 1 9 4 0 2 3 3 3	Manifest	2. Page of			he shaded area by Federal la
DRESSER INDUSTRIES HWY 167 N		LA	Manifest Doci	66	22116
ALEXANDRIA 71309-1430 318-646-2250 5-Transporter 1 Company Name 6 / 1 4 4S 5RA ID Numb	nor -	States		1 700 C	794
Custon Ecology Inc 1/1006 1019	4180		Transporter's		0558/
7. Transporter 2 Company Name 8. US EPA ID Numb	per		Transporter's	ID (1177)	dista
Designated Facility Name and Site Address     1C. US EPA ID Numb.	per		porter's Phone Facility's ID	1. 11.3-1	F 1 2
CHEMICAL WASTE MANAGEMENT, INC.		1 - 1000			99922
7170 JOHN BRANNON RD. SULPHUR LA 70665 LL al Di ol of Q 7 7 3	7 2 0 1	ph 7	ty's Phone	(318	583-2169
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Conta	Type	Total Quantity	Unit Wt/Vol	I. Waste No.
RQ, HAZARDOUS WASTE, SOLID, N.O.S,9,NA3077,III, (DOO8)	0 0 1	d.M	1 1 1 6	ay	D008
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C. 17.57	1.		-111		10.
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	1 1				
a. A54350 on sib no services community and or an analysis of the means of the services of the	of Aller and		ling Codes for	Wastes List	ed Above
If discrepancy contact TURNER at (318 640 62)  15. Special Handling Instructions and Additional Information  If spilled, contain and avoid skin contact.  Terry A.	24 <u>5</u> .4s	1a.	1132 1/1/0 20 25	# 18	05710
If discrepancy contact TURNER at (318 640 62)  15. Special Handling Instructions and Additional Information  If spilled, contain and avoid skin contact.  Terry A.	245. 145. 156	11a. 1 N P	1132 1/1/0 20 25	# 10 30 2#.	05710 74-61 371
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J. Additional Descriptions for Materials Listed Above  a. A54350 orab 10. Service Activities at 118 640 62  If discrepancy contact TURNER at 318 640 62  15. Special Handling Instructions and Additional Information  If spilled, contain and avoid skin contact.  If emergency, contact Turk 318,640 62  ERG#171  II KNEE 318-640-6  GENERATOR'S CERTIFICATION: There by declare that the contents of this consignment are fully and accurately described in all respects in proper condition for transport by highway according to applicable internutorial and national government regulations.  If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity waste generation and select the best waste management method that is available to me and that I can afford  Printed Profed Name  Printed Typed Name  17. Transporter 1 Acknowledgement of Receipt of Materials  Printed Typed Name  17. Transporter 1 Acknowledgement of Receipt of Materials  Signature  Signature  Signature	245. 156 ribed above by progree I have lightermine a environment Off	Poper shipping in	1132  AWO  O 25  Tame and are classif	# 10 2# fed packed, ma le and that I hav I have made a	0.5 710 74 - 61 371 rked, and labeled, and a e-selected the practical good faith effort to minin
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A. A54350 corplete to the contact TURNER at (319 640 62)  If discrepancy contact TURNER at (319 640 62)  If emergency, contact TURNER at (318,640 62)  If emergency, contact TURNER at (318,640 62)  If emergency, contact TURNER at (318,640 62)  If an emergency, contact TURNER at (318,640 62)  If emergency, contact TURNER at (318,640 62)  If a majerial and atomic transport by highway according to applicable international and national government are fully and accurately described at a greatest in an expect so in all respects in proper condition for transport by highway according to applicable international and national government repulsations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and boxetly waste generator at other deprendency of the present and future threat to human health and the my waste generator, and select the best waste management method that is available to me and that I can a strong.  Printed Typed Name Turner Acknowledgement of Receipt of Materials  Printed/Typed Name Signature  DOCUMENT 5(B): MANIFEST  20. Facility Owner or Operator. Certification of receipt of hazardous materials covered by this manifest experience of the standard construction of the standardous materials covered by this manifest experience of the standardous materials covered by this manifest experience.	245 156 ribed above by proceedings of the process o	Per shipping no per shipping to be face in a mail	1132  AWO O 25  Tame and are classic principally practicable bushing generator.  PLANEY  Sam	# 10 2# fed packed, ma le and that I have I have made a	OS 710 74-61 371 rxed, and labeled and a e selected the practical good faith effort to minin
3. Additional Descriptions for Materials Listed Above  a. A54350 organization of the second of the s	245 156 ribed above by proceedings of the process o	Per shipping no per shipping to be face in a mail	1132  AWO O 25  Tame and are classic principally practicable bushing generator.  PLANEY  Sam	# 10 2# fed packed, ma le and that I have I have made a	OS 710 74-61 371  rxed, and labeled and a eselected trie practical pood faith effort to mining from the practical pood faith effort by pay 70  Month Pay 70

# Section #4

#### Section 4:

Question 6 with summary and samples of lead seals:

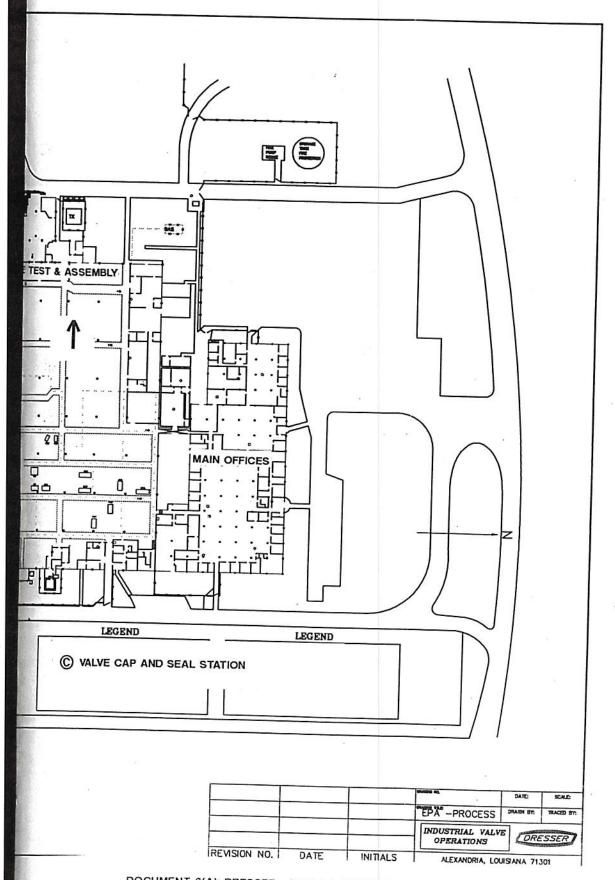
- 6. Provide a flow diagram of the processes at this facility. Included all waste streams generated at the facility in the diagram.
  - Document 6 (A): Flow diagram of whole plant and general process flow:
  - Document 6 (B): Flow diagram of plant trash pick up route and flow to the incinerator CA 1364:

#### Summary:

Two (2) areas of clarification and a need for improved waste management of this waste stream evolved from this information request review.

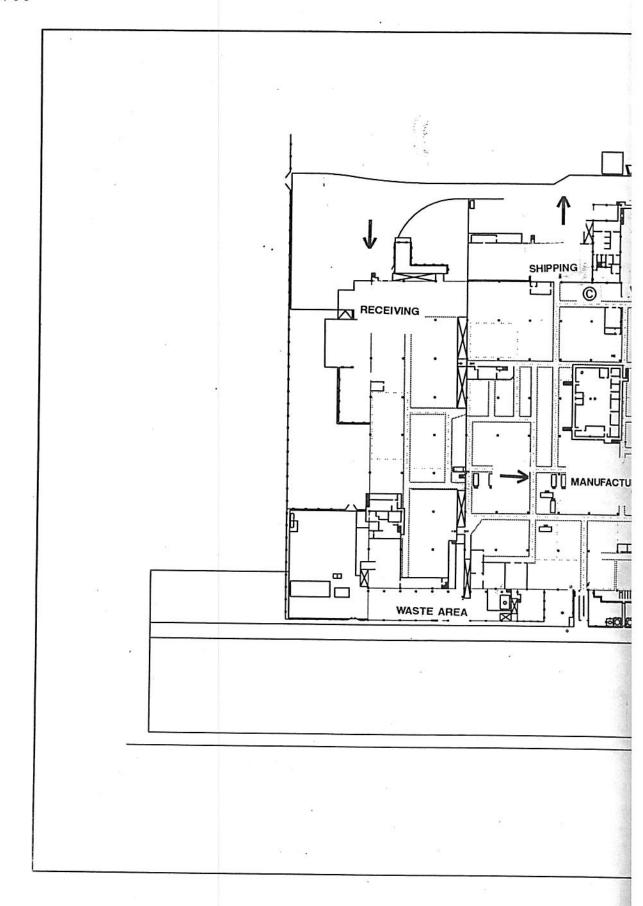
- 1. The incinerator was acquired (Document 3A1 State air permit and has always been used for plant trash and was not intended nor used as a hazardous waste incinerator. Although the lead was found in 1990in the TCLP of waste ashes (Document 4 (A)) Dresser made a very concerted effort to segregate the lead seals from getting into the trash waste stream. (33 documents (4B) of TCLP's all below the 5 PPM threshold) to ensure that the lead seals were being segregated and still are today photograph (3G). Dresser completed the segregation task, but did not de-classify the waste, as there was still no approved site in Rapides Parish. Dresser has sent this waste to EPA and LaDEQ permitted facilities for either hazardous waste (Chemical Waste Management facility at Lake Charles La. EPA ID No.LAD000777201 or the new Industrial Solid Waste Landfill Class "D" Grant-LaSalle LaDEQ approved.
- The management of this waste stream and its declassification will be top priority if FY 2003 and the elimination of lead seals from the process of valve manufacturing completely will enhance this effort.

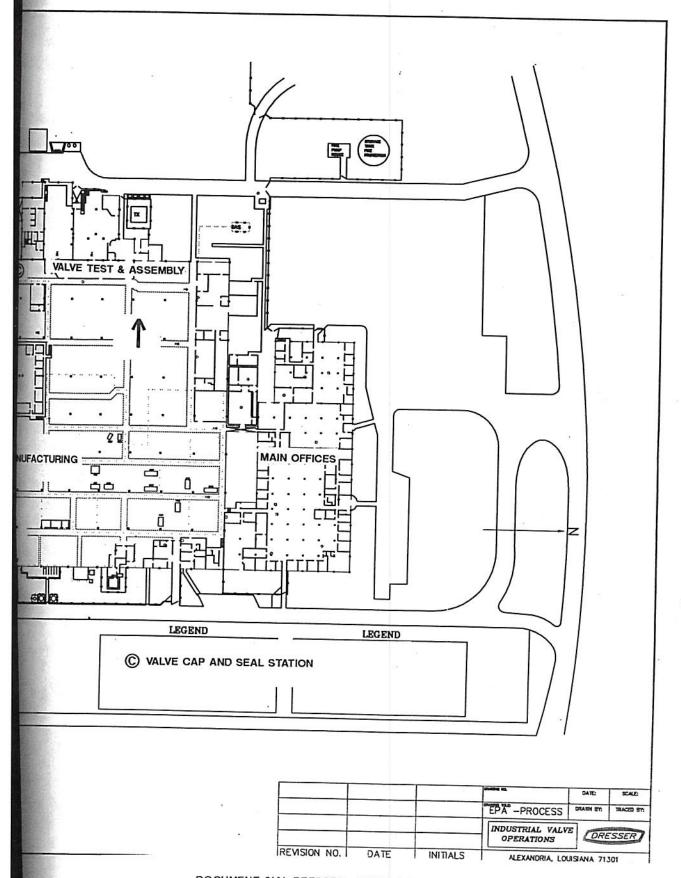
Answered by: Terry A Turner Consulted with: Earl Wenzel



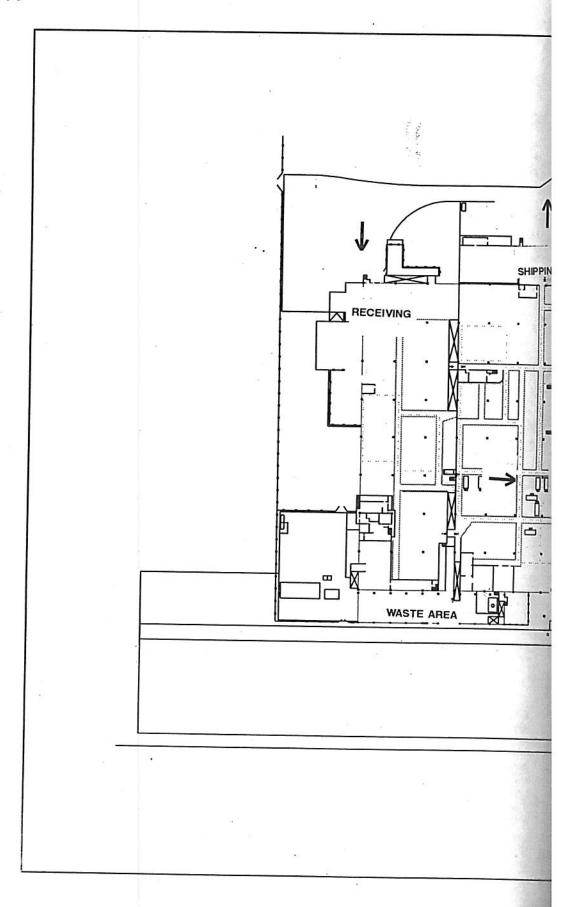
DOCUMENT 6(A): DRESSER - ALEX. LA MANUFACTURING FACILITY PROCESS FLOW

Narexdo:ALEX (FIRE)





DOCUMENT 6(A): DRESSER - ALEX. LA MANUFACTURING FACILITY PROCESS FLOW





#### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 6 1445 ROSS AVENUE, SUITE 1200 DALLAS, TX 75202-2733



NOV 0 9 2001

Mr. Curtis J. Hensley Director of Manufacturing Dresser Flow Control P.O Box 1430 Alexandria, LA 71309-1430

Dear Mr. Hensley:

Enclosed you will find a copy of the Resource Conservation Recovery Act (RCRA) Compliance Evaluation Inspection (CEI) report as compiled by the U.S. Environmental Protection Agency (EPA) for the inspection conducted at your facility on June 14, 2001.

The CEI report indicates that there are some concerns about the waste management practices at the Dresser Flow Control facility as these practices are related to the RCRA regulations. A copy of this report has also been sent to the Louisiana Department of Environmental Quality (LDEQ).

Please be advised that EPA will be communicating with you shortly concerning the resolution of EPA's regulatory concerns as these apply to RCRA.

If you have any questions concerning the CEI conducted at your facility, you may contact Ms. Melissa Smith of my staff at (214) 665-7357.

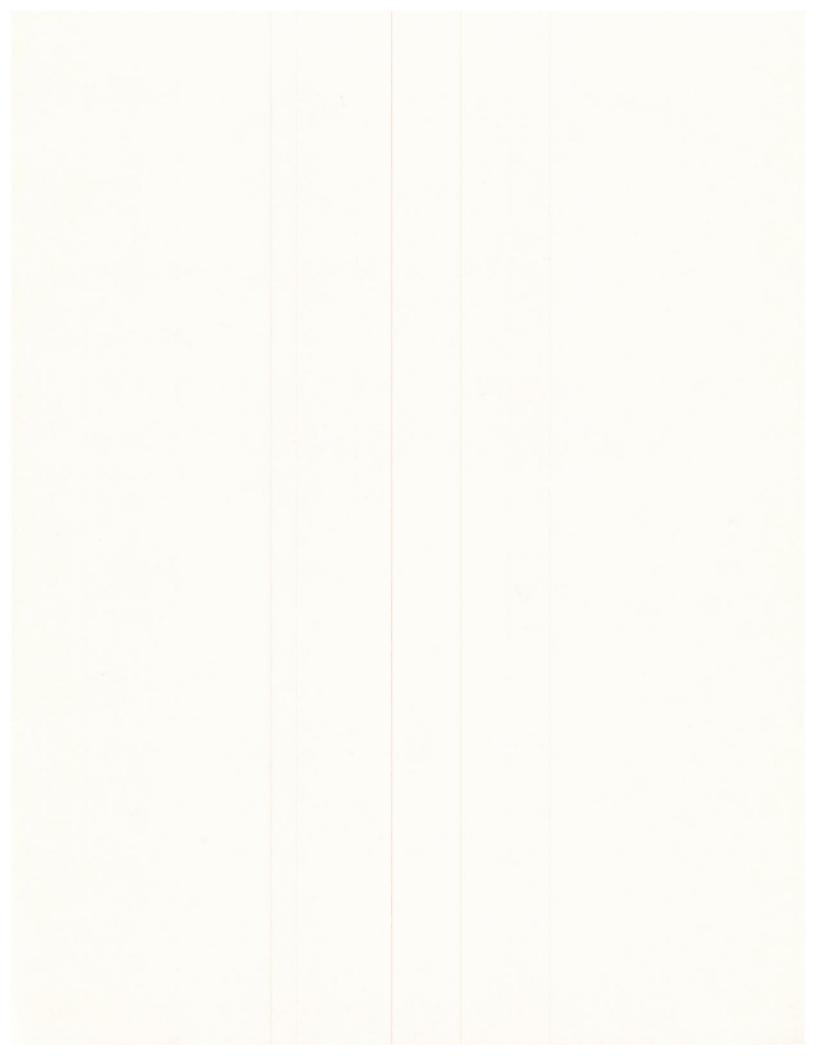
Sincerely yours,

Carol D. Peters-Wagnon, Chief

ALONM Section (6EN-HS)

Hazardous Waste Enforcement Branch

Enclosure



HZ/RC/EN LAD 07/940235



Friday, April 01, 2005 (Revised and updated 5/23/05)

Craig Lutz (214)665-2190
United States Environmental Protection Agency
Region 6
1445 Ross Avenue, Suite 1200
Dallas, TX. 75202-2733
RE: Docket RCRA-06-2003-0903



Craig,

Attached is the final SEP Closure report. We have incorporated the summary of expenditure narrative, and the projected operating cost on an annualized basis. The final engineering instructions have been completed, and approved with training in progress, and start up is on schedule.

This is the final report on this SEP project. I have advised our corporate staff and copy to EPA region VI as per CAFO.

Thanks for taking the time to review the rough draft to see if we have incorporated all the information needed to complete this SEP closure report.

Terry A. Turner

### Copy:

7

Carol Peters-Wagon, Chief RCRA Enforcement Branch ALONM Section (6EN-HS) Compliance Assurance and Enforcement Division U. S. EPA – Region 6 1445 Ross Ave. Dallas, Texas 75202-2733

Martha Bixby, Environmental, Health, Safety Director Dresser Inc. Dresser Inc. 15455 Dallas Parkway Suite 1100 Addison, TX. 75001

Robin Everly Senior Counsel Dresser Inc. 15455 Dallas Parkway Addison, TX 75001

Curtis Hensley, Director of Operations Dresser Flow Solutions P. O. Box 1430 Alexandria, La. 71309-1430

J. R. Fentem, VP and General Manager – Pressure Relief Dresser Flow Solutions

Houston, TX

J. R. Foster, Manager of Manufacturing Dresser Inc. PO Box 1430 Alexandria. La. 71301

### SEP Closure report index

1	SEP Closure report	Page 1-3
2	SEP Graphic of expenditures	Page 4
3	Purchase order copies	Page 5-8
4	Invoices for project	Page 9-11
5	SEP Certification statement	Page 12

### Sep Closure Report shall address the following:

# a. A summary analysis in graphic and narrative form of all SEP monetary expenditures:

The narrative for the expenditures is broken down to three (3) phases of the project.

 The project(s) capital expenditure for the time and improvements to implement the conversion of the "zinc phosphating" process to "black oxide" process closed loop system.

#### Phase I

Feb. 2004 an engineering manager, a manufacturing manager, and myself went to review a company that was using the black oxide process, a review of the process to see if it would be a good coating to change over to for our product line. We then also sent off some samples off our valve products to verify coating quality and suitability. We performed a salt spray test to validate the same consistency of the black oxide vs. a zinc phosphate coating. Both Engineering and manufacturing agreed this would be a satisfactory coating.

Approx. cost \$2,500.00 Expense:

#### Phase II

Feb 2004 a capital funding project was written for the equipment and installation for the change over from zinc phosphating to "black oxide".

The funding for this phase was \$40,000.00

Approval was received in March 2004:

Quotes and system needs were then drawn up and Birchwood Casey was awarded Purchase orders to proceed ahead on this project:

The installation funding for the project was awarded to AJC a local HVAC/Mechanical contractor.

#### Phase III

Jan 2005 Approx. \$ 8,000.00 of new chemicals to convert to "black Oxide" coating was acquired:

### Summary Table:

Cost Item	Vendor	Amount
<ol> <li>"Black Oxide" Coating system</li> <li>Fabrication and installation</li> <li>"Black Oxide" Chemicals</li> <li>Mfg. Eng., Valve Eng., Plant E</li> </ol>	Birchwood Casey Allen Jenkins Contractor Birchwood Casey ng. Dresser	19,280.00 18,740.00 8,514.00 2,500.00
Sub total		49,034.00
Cost Item for projected annual op Based on a 20-30 per month ope	reconstruction of the production of the contract of the contra	
<ol> <li>"Black Oxide' make up</li> <li>Dresser operator</li> <li>Utilities (Power/ Water)</li> </ol>	Birchwood Casey Est. 20-30 hrs./\$35.00 Est. 125/month	3,650.00 12,600.00 1,500.00

Graphic Narrative Page # of :

 A summary analysis of the project with explanation of the respondent's adherence to the implementation plans approved by EPA.

Summary analysis of the project.

The completion of the CAFO set the wheels in motion to get this project going:

#### Quarter by Quarter review:

- First quarter was the investigation, the finalization, and implementation planning stages
  where the process "black oxide" was finalized as a direct replacement for our current
  "zinc phosphating" process and still retain product quality, and would not introduce a
  safety problem. There will still be a need to have well trained personnel that know how to
  handle chemicals (acids/caustics) safely.
- Second Quarter begin the layouts, and changes to tank configurations, and means to set up a "closed loop" system. Birchwood Casey recommended a general arrangement quote and the re-circulation system was a custom made unit.
- Third Quarter all the purchase orders were issued to finalize the process to acquire the equipment.
- 4. Fourth quarter finishing the engineering instructions, operational procedures and getting the process ready to be put in place.
- Fifth Quarter receiving the equipment, making platforms to get re-circulation equipment off of the floor (steel spill protection pan) and piping to start up.
   This is the final phase and brings in the submission of the closure report, which is being done.

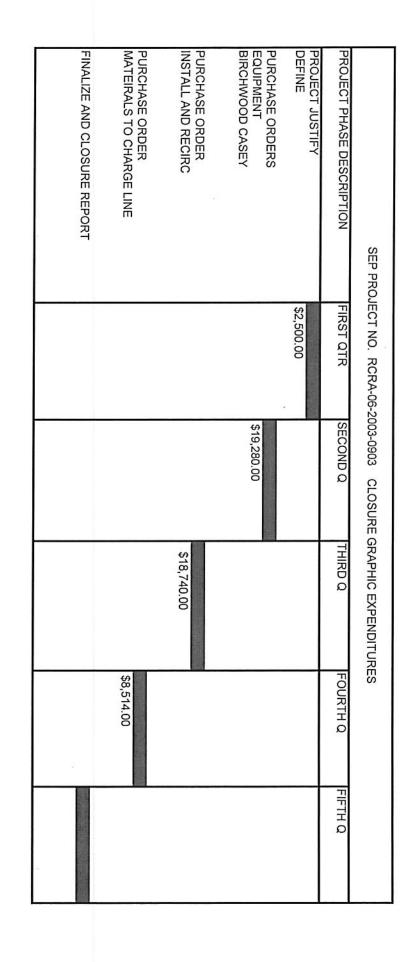
c. A lesson's learned section describing what, if any adjustments to the approved implementation plan had to be made and the reason(s) why adjustments had to be made.

The final review, engineering instructions, chemistry consistency, and operation of the "closed loop" system identified the need qualified; trained personnel would be beneficial from a safety point of view. The last six to eight months we had been using the shop machining personnel to run the old zinc phosphating system, and it has ran over 4-6 times causing a spill in contained pans, and cleanup, which was a two day maintenance job that could have been avoided. This validated the need for trained maintenance personnel, since the process will be closed loop and we need even more operator attention to make this process work well.

d. Certification of all funds spent implementing the SEP, documented by copies of purchase receipts, cancelled checks, etc.

Attached is a copy of the of purchase orders, invoices, and cancelled checks to complete the implementation of this project. Also a certification document is signed to the validation of funds spent on this SEP project. Non purchased items cost were best estimates of the labor cost.

. . .





PARTIAL PAYMENTS ALLOWED:  BASED ON PO ISSUED BY 8/6/04 DELIVERY 9/24/04  DRAWINGS FOR APPROVAL BY 8/18/04 TO RETURN NLT 8/24/04:  COFIRMED TO MARK R8/2/45 TAT SEE ATTACHMENT FOR	Vendor Informa	ation		BIRCHWOOD	Work Orde	r#	Purch	ase Order#			
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Name				200 0/6			CONI	=			
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Page 5



Vendor Info	rmation		019569	Work Orde	r #	Purch	ase Order#	
BIRCHWC	OOD CASEY			141	500	29	95458-6	
PROGRAMMENT AND THE	LER ROAD			Date Of Requi	sition	R	elease#	
EDEN PRA (952)937-7		MN 5 (952)93	5344 7-7979	01/18/05		SUB TAT		
QTY	Part #	(002)00		Description			Total Cost	
165			GALLONS (3 - 55 GALL		EMP XL B	LACK OXIDE		
			CONCENTRATE \$37.80	PER GALLON			6237.00	
165			GALLONS ( 3-55 GALLO	ON DRUMS) OF DRI-TO	TOUCH II	RP1 RUST		
200000			PREVENTIVE COMPOL				2277.00	
	. i							
							Account of the Control of the Contro	
Char	-14		CA #	Combination	244	Total	8514.00	
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Vendor In	formation		019569	Work Orde	r#	Purch	ase Order#	
BIRCHV	VOOD CASEY	7		140	0502	295302-6		
Secretaria de la compansión de la compan	LLER ROAD			Date Of Requ	isition	R	elease#	
EDEN P (952)937			55344 37-7979	_ 11/09/04		CONF 3-17		
QTY	Part		1	Description			Total Cost	
110	, Luit		GALLONS OF SAFE SO					
1600		OWDER \$2.90/LB			2079.00			
1000			EBO OF OXTENDENT	0110 Q2.30/LB				
		<u> </u>	ABOVE FOR INITIAL CH	HARGE OF THE BLAC	K OXIDE S'	YSTEM TO		
			UP AND CHANGE OVE	R FROM ZINC PHOSP	HATE SYS	ТЕМ		
			WILL BE ONE TO TWO	YEAR SUPPLY AND V	VILL FOLLO	OW UP WITH		
•			THE MAKE UP SUPPLY	AMOUNTS IN 5 GALL	ON PAILS			
						Total		
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D 130								
PAUL V. F	IICKS				0			
	Carrier		Way E	Bill #				
Į.	Approved By		Appro	oved By		Approv	ed By	





Vendor Information 006660			Work Orde	er# Purchase Order#			
ALLEN JENKINS CONTRACTOR INC.			139	39502 19		5004-6	
1509 MELROSE ST.			Date Of Requ	uisition R		elease#	
PINEVILLE LA 71360 443-0164 443-0407			07/27/04		AR		
QTY Pai			Description		Total Cost		
1		TO COVER COST OF A	•	RIALS TO	FABRICATE		
		AND INSTALL TWO (2) E	EXHAUST VENTILATI	ON SYSTE	MS FOR THE		
		"BLACK OXIDE" PROCE	SS TANK SYSTEMS (	(\$5,120/EA)		10240.00	
2		TO FABRICATE AND INSTALL TWO(2) PROCESS TANKS FOR THE					
		"BLACK OXIDE" PROCESSS TANKS SYSTEMS (4,250/EA)			8500.00		
		BASED ON PO ISSUED BY 8/6/04:					
		DRAWINGS FOR APPROVALS BY 8/23/04					
		COMPLETED AND INSTALL BY OCT 4,2004 WEEK					
		SEE ATTACHMENT FO	R PAYMENTS				
					Total	18740.00	
Stock		CA#			or Completion		
		14:53:1086:701	11		1	1	
Vendor Ordered Date Ven		dor Delivery Date	Hot			ID#	
11		11	6			15149	
Deliver To		Charg	е То		Equipmen	t Info	
PLANT ENG D 130 T. TURNER		AR04-1086-701-00 14:53:1086:701:00		OKUMA MX-60HB 0143			
Carrier		Way B	ill#				
Approved By	,	Appro	ved By		Approv	red By	



Birchwood Laboratories, Inc. 7900 Fuller Road Eden Prairie, Minnesota 55344-2195 FEIN 41-1351619

DRESSER INC
D ATTN: A/P
T PO BOX 1430
ALEXANDRIA LA 71309

DRESSER INC
P HIGHWAY 167 N
T ALEXANDRIA LA 71301

0	ALEXANDRIA L	A 71309		WY 21 21 20 20 20 20 20 20 20 20 20 20 20 20 20	ENCOSE MUMBER
BUSTROW	TATE OF INVOICE	PURCHASE ORDER NO	SHEPPONER NOVIERS	NATION OF THE PARTY OF THE PART	70710
NET 30	DAYS	VERBAL MOREY	60178 / 575	9/14/04	79742
ANTIX	TEM NO	TIME	ARIFTON IN		300
1	891300	RINSE WATER PROCE Less 50% DOWN PAY	SSING SYSTEM MENT		\$ 19,280 00 - 9,640 00
		······································	95005 6 101-00 95005 6 101-00 1086 04 1086 04	01	
		AR	4.53! Dugt	INVOICE TOTAL	9,645-00
			12/24		
THE PERSON	V 1995 (1995)	EHEPING REQUISITION	AVOIDITEUR STIP	Constance of	FAMILIE SENTE
<u> 2399496".</u>	7.04 (j. 20.7) (2.20.) 2.04 (j. 20.7) (2.20.)	55873-4	Y, AND SUBJECT TO, THE	TERMS AND CONDITIO	DNS
	TL	E CALF IS GOVERNED D	ין אווף טטטטייי	INC HEREOF	

THE SALE IS GOVERNED BY, AND SUBJECT TO, THE TERMS AND CONDITIONS OF SALE SET FORTH ON THE REVERSE SIDE HEREOF.

## PLEASE RETURN THIS STUB WITH YOUR REMITTANCE

TO INSURE PROPER CREDIT TO YOUR ACCOUNT PLEASE MAKE CHECK PAYABLE TO AND REMIT TO:

BIRCHWOOD LABORATORIES, INC. 7900 FULLER ROAD EDEN PRAIRIE, MN 55344-2195 CUSTOMER NAME DRESSER INC ACCOUNT NO IOUNICE NO. 79742
INVOICE DATE 9/14/04

INVOICE DATE 9/14/04 INVOICE AMOUNT \$ 9,640.00

CASH DISC. AMOUNT CASH DISC. DATE

CHECK NUMBER \_\_\_ DEPOSIT AMOUNT

.i. 0

Apr. 01 2005 02:56PM

M/K cog.

### ALLEN JENKINS CONTRACTOR, INC.

1509 MELROSE STREET PINEVILLE, LA 71360 FAX: 318-443-0407 PHONE: 318-443-0164 INVOICE

DATE

INVOICE #

11/29/2004

112904AJC2

JOB LOCATION

JOB# DRE-PL D-188 PARKERIZER LINE NEW TANKS

DRESSER FLOW CONTROL P. O. BOX 1430 ALEXANDRIA, LA. 71309-1430 ATTN: MR. TERRY TURNER

P.O. #	Project / AJC Job #	Scope of Work	
195004-6	DRE-PL	New Tanks	
	DESCRIPTION		AMOUNT
nish materials and labor	to fabricate three steel tanks. This is a part	tial billing against this P.O. #	4,759.13
	DEC 1 6 2	004 O21497	

Thank you for your business.

**Total** 

\$4,759.13

Page 10

### ALLEN JENKINS CONTRACTOR, INC.

Thank you for your business.

1509 MELROSE STREET PINEVILLE, LA 71360 FAX: 318-443-0407

PHONE: 318-443-0164

INVOICE

DATE

INVOICE #

12/9/2004

120904AJC3

JOB LOCATION

JOB# DRE-PL D-188 PARKERIZER LINE Black Oxide Project

**Total** 

DRESSER FLOW CONTROL P. O. BOX 1430 ALEXANDRIA, LA. 71309-1430 ATTN: MR. TERRY TURNER

P.O.#	Project / AJC Job #	Scope of Work	
195004-6	DRE-PL	Black Oxide Installati	on
	DESCRIPTION		AMOUNT
rnish materials and labor	to install the Black Oxide Process system	n.	
enovation to ventilation sy irnish materlals and labor	stems over tanks to install the Black Oxide Process tanks	and rinse tanks.	10,240.00 3,740.87
: <u> </u>			
JAN 13-7: O	1 2 2005 Shell (# 02/108		
			E

\$13,980.87

# SEP CERTIFICATION SUBMITTED BY RESPONDENT/DEFENDANT WITH SEP PROPOSAL:

I certify to be true and accurate that Dresser, Inc. had not previously decided to implement the proposed Supplemental Environmental Project (SEP) prior to EPA's identification of the environmental violations and further certify that Dresser, Inc. did not commit funds necessary to implement the SEP prior to EPA's identification of the environmental violations.

Representative of Dresser, Inc.

Date

Title

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